

J. White Dep.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
5:19-CV-00467-BO

JUSTIN J. WHITE,)
)
Plaintiff,)
)
vs.)
)
VANCE COUNTY, NORTH CAROLINA;)
VANCE COUNTY SHERIFF'S OFFICE;)
PETER WHITE, in his official and)
individual capacities;)
LAWRENCE D. BULLOCK, in his)
official and individual capacities;)
WELDON WALLACE BULLOCK, in his)
official and individual capacities,)
and WESTERN SURETY COMPANY,)
a division of CNA SURETY,)
)
Defendants.)
)

VIDEOTAPED VIDEO CONFERENCE DEPOSITION
OF
JUSTIN J. WHITE

TAKEN VIA VIDEO CONFERENCE AT THE LAW OFFICES OF:
WOMBLE BOND DICKINSON (US) LLP
ONE WEST FOURTH STREET
WINSTON-SALEM, NC 27101

02-10-21
10:15 O'CLOCK A.M.

Lori Gruber
Court Reporter

Chaplin & Associates
132 Joe Knox Ave, Suite 100-G
Mooresville, NC 28117
(704) 606-1434 | (336) 992-1954 | (919) 649-4444

2		4	
ATTORNEY NOTES		INDEX	
PAGE/LINE	NOTES	STIPULATIONS EXAMINATION	7
		By Mr. Castro	9
		By Ms. Robinson	236
		ADJOURNMENT	242
		REPORTER CERTIFICATE	243
		WITNESS CERTIFICATION	244
		WITNESS ADDENDUM	245
		EXHIBITS	
		Name	Offered By Identified
		Exhibit 1	Mr. Castro 21
		(Amended Notice of Deposition, Plaintiff)	
		Exhibit 3	Mr. Castro 87
		(Amended Complaint)	
		Exhibit 4	Mr. Castro 225
		(Plaintiff's Motion for Leave)	
		Exhibit 6	Mr. Castro 22
		(Plaintiff's Responses to Interrogatories and Requests for Production)	
		Exhibit 9	Mr. Castro 89
		(Official Written Reprimand)	
		Exhibit 10	Mr. Castro 98
		(Employee Counseling Record, Justin White)	
3		5	
APPEARANCES OF COUNSEL		EXHIBITS (Continued)	
FOR THE PLAINTIFF JUSTIN J. WHITE:		Name	Offered By Identified
Sharika M. Robinson, Esquire		Exhibit 11	Mr. Castro 101
(via video conference)		(Statement from Deputy Brian K. Wayne)	
THE LAW OFFICE OF SHARIKA M. ROBINSON, PLLC		Exhibit 12	Mr. Castro 104
10230 Berkeley Place Drive, Suite 220		(Statement from Sergeant D.R. Roberson)	
Charlotte, NC 28262		Exhibit 13	Mr. Castro 107
srobinson@sharikamrobinsonlaw.com		(Statement from Sergeant Alexander)	
FOR THE DEFENDANT VANCE COUNTY,		Exhibit 14	Mr. Castro 120
NORTH CAROLINA, ET AL.:		(3-27-18 Incident - Counseling Form)	
Brian Castro, Esquire		Exhibit 16	Mr. Castro 125
WOMBLE BOND DICKINSON (US) LLP		(3-27-18 Incident - Insurance Form)	
555 Fayetteville Street, Suite 1100		Exhibit 17	Mr. Castro 126
Raleigh, NC 27601		(3-27-2018 Video)	
brian.castro@wbd-us.com		Exhibit 19	Mr. Castro 169
OTHER APPEARANCES		(Oliver Incident - Medical Documentation)	
Michael McGurl (via video conference)		Exhibit 20	Mr. Castro 209
Shannon Skoog, Technician (via video conference)		(Release Authorizations)	
		Exhibit 24	Mr. Castro 224
		(Statement from Deputy Patel)	
		Exhibit 25	Mr. Castro 204
		(F-5 Report of Separation Form)	

E X H I B I T S (Continued)			6	1	8
Name	Offered By	Identified		2	
Exhibit 28	Mr. Castro	232		3	
(Tuition Reimbursement Agreement)				4	
				5	
				6	
				7	
				8	
				9	
				10	
				11	
				12	
				13	
				14	
				15	
				16	
				17	
				18	
				19	
				20	
				21	
				22	
				23	
				24	
				25	
NOTE: Quoted material has been reproduced as read					
quoted by the speaker.					
STIPULATIONS			7	1	9
Pursuant to Notice and/or consent of the parties,				2	
the deposition hereon captioned was conducted at the				3	
time and location indicated and was conducted before				4	
Gruber, Notary Public in and for the County of Iredell,				5	
State of North Carolina at Large.				6	
Notice and/or defect in Notice of time, place,				7	
purpose and method of taking the deposition was waived.				8	
Formalities with regard to sealing and filing the				9	
deposition were waived, and it is stipulated that the				10	
original transcript, upon being certified by the				11	
undersigned court reporter, shall be made available for				12	
use in accordance with the applicable rules as amended.				13	
It is stipulated that objections to questions				14	
and motions to strike answers are reserved until the				15	
testimony, or any part thereof, is offered for evidence,				16	
except that objection to the form of any question shall				17	
be noted herein at the time of the taking of the				18	
testimony.				19	
Reading and signing of the testimony was requested				20	
prior to the filing of same for use as permitted by				21	
applicable rule(s).				22	
				23	
				24	
				25	
	</				

<p>1 Q. Okay. So you pretty much know how it goes. 2 I ask that you give yes or no answers rather than 3 uh-huh (yes) or huh-uh (no) in order to assist the 4 court reporter in getting this down. Can you please 5 state your full name for the record? 6 A. Justin Jamel White. 7 Q. How do you spell your middle name? 8 A. J-A-M-E-L. 9 Q. Okay. And whenever you need a break or 10 anything throughout this deposition, of course, feel 11 free to let us know. That goes for the court reporter 12 and everyone that's participating on this call. What 13 is your date of birth? 14 A. 8-15-1989. 15 Q. Okay. And what is your current place of 16 residence? 17 A. I live in Charlotte, North Carolina. 18 Q. Okay. And who is currently in the room with 19 you right now? 20 A. Attorney McGurl. 21 Q. Okay. Are you prepared to testify today? 22 A. Yes. 23 Q. Are there any substances or other 24 impairments that would stop you from testifying 25 competently?</p>	<p>10 1 enforcement training certificate and general law 2 enforcement training certification. 3 Q. Okay. What process does it take to get 4 those certifications and certificates? 5 A. It's approximately a 17 to 18-week training 6 course to get your basic law enforcement training 7 certificate, which is also known as BLET. And then 8 once you get hired at an agency, you work 12 months, 9 you get your general law enforcement training 10 certification. 11 I also have a Master's of Science Degree in 12 Justice Studies from Southern New Hampshire 13 University, and I'm also working on my doctoral in 14 Public Administration at Capella University. 15 Q. And what was the focus of your studies for 16 your master's degree? 17 A. Justice studies. 18 Q. Can you elaborate on what that means? 19 A. Yes. Justice studies is a form of criminal 20 justice. It's similar to a born identity of criminal 21 justice that focuses on social justice and other 22 different types of justice such as restorative -- 23 distributive justice, et cetera. 24 Q. And what is the focus of your doctoral 25 degree?</p>
<p>11 1 A. No. 2 Q. Okay. All right. We'll start with some of 3 your background information. Can you please tell us 4 where you went to high school? 5 A. Perquimans County High School in Hertford, 6 North Carolina. 7 Q. Did you go to college after that? 8 A. Yes. 9 Q. Where did you go? 10 A. For my first year, I went to Shaw University 11 in Raleigh, North Carolina. I transferred to Mount 12 Olive College in Mount Olive, North Carolina, which is 13 now the University of Mount Olive. 14 Q. And what did you study? 15 A. I studied criminal justice and criminology 16 at Mount Olive College. 17 Q. Okay. Did you want to become a law 18 enforcement officer during that time? 19 A. Yes. 20 Q. Okay. Is that the reason you focused on 21 criminal justice? 22 A. Yes. 23 Q. Okay. Can you tell us about your 24 certification as a law enforcement officer? 25 A. Yes. I have -- I had a basic law</p>	<p>12 1 A. Public administration. 2 Q. Okay. All right. When you went through 3 BLET as you described, what type of training, what 4 aspects of the job were you trained in? 5 A. I was trained in the fundamentals of being a 6 law enforcement officer, whether it be a police 7 officer or a deputy sheriff, ensuring public safety. 8 The training centered on achieving the law enforcement 9 objective at the basic level, which was serving, 10 protecting, preserving peace, ensuring the safety in - 11 - of all citizens in your jurisdiction. 12 Q. Did you get any training in the use of 13 force? 14 A. Yes. 15 Q. Can you describe that for me? 16 A. The use of force training continuum 17 consisted of several layers from soft hands, first arm 18 de-escalation command presence, to soft hands to hard 19 hands. To chemical munition, such as pepper spray, 20 using your baton, using your taser, the baton and 21 taser if your department allowed, as well as, if 22 necessary, discharging your department-issued firearm. 23 Q. And when you say, "de-escalation," what 24 types of de-escalation methods were you trained in? 25 A. First, we need the command presence. We</p>

<p>14 1 need to do everything we can to calm the situation, to 2 bring peace to the situation to prevent an escalation 3 that may require using force for control and 4 compliance purposes. 5 Q. Is this done verbally? 6 A. Yes. 7 Q. And what does "soft hands" mean? 8 A. Soft hands is a lesser form of using 9 physical force in terms of the use for escort 10 positions: handcuffing, take downs, the ultimate hand 11 strikes, stuns. It's basically de minimis force. 12 Q. So do you consider take down soft hands? 13 A. It is soft hands, yes. 14 Q. Do you consider take downs de minimis force? 15 A. Yes. 16 Q. So how -- is there a specific amount of time 17 that you should focus on de-escalation before you used 18 soft hands? How does it work? 19 A. No. There's no specific amount of time. 20 Q. When do you go from de-escalation to soft 21 hands? 22 A. The officer will make a decision based on 23 the totality of circumstances, based on what's going 24 on at the scene. 25 Q. Do you base it at all on how the citizen is</p>	<p>16 A. Pepper spray is a part of the equipment and I asked for my equipment to do my job. So for the purposes of that, yes. Q. So you did not mention pepper spray when you asked for your equipment? A. I told them the things that I needed. In terms of remembering word for word what I needed, I unable to recall, but pepper spray was a part of my equipment. Q. Okay. So --- A. I could have, but at this time, pepper spray was a part of my equipment. So it would've been requested. Q. Understood. Was that your first time being issued pepper spray at Vance County? A. Yes. Q. So did you ever get trained in pepper spray after you were issued pepper spray? A. No. Q. Were you told to seek training in pepper spray? A. No. Instead, I was told that training would be provided by the SO because they train our deputies and sometimes the police department managers of the police department would send officers over who need</p>
<p>15 1 acting, the person you're dealing with is acting? 2 A. That is part of it. 3 Q. What do you look for when you're seeing -- 4 when you're dealing with a citizen to determine 5 whether there may be aggression or non-compliance? 6 A. I look for their cooperation. I look for 7 their -- to determine whether or not they're going to 8 be uncooperative, if they're going to be resistive, 9 aggressive, non-compliant, non-cooperative, 10 assaultive. 11 Q. Okay. So you also mentioned pepper spray. 12 Were you taught about pepper spray during BLET? 13 A. No. 14 Q. Did they mention pepper spray at all during 15 that? 16 A. They mentioned pepper spray, but we were not 17 trained on pepper spray. 18 Q. Okay. Did you -- when was the first time 19 you were actually issued pepper spray during your full 20 employment, during your entire career? 21 A. I was issued pepper spray at Vance County 22 Sheriff's Office, I will say approximately late 2017 23 Q. Did you request to be issued pepper spray? 24 A. I requested my equipment. 25 Q. Did you specifically request pepper spray?</p>	<p>17 1 training as well. 2 Q. Do you know if you could have sought 3 training on your own? 4 A. I'm not aware of it. 5 Q. Are you aware of pepper spray training that 6 is outside of the Vance County Sheriff's Office, not 7 provided by them specifically? 8 A. No. 9 Q. Did you ever attempt to get trained or ask 10 to get trained? 11 A. No. I've never attempted to get trained in 12 pepper spray. 13 Q. Why not? 14 A. Because the department said that they will 15 provide it. 16 Q. Okay. Did you -- were you aware that 17 training in pepper spray involves possibly getting 18 sprayed with it? 19 A. Yes, you will be sprayed. They say that you 20 will be sprayed. 21 Q. Did that concern you at all? 22 A. No. 23 Q. So can you briefly go through your 24 employment history with me after -- from the time you 25 left the university that you mentioned, Mount Olive?</p>

<p>18</p> <p>1 A. Yes. I worked for the North Carolina 2 Department of Public Safety from 2012, I believe it 3 was November, 2012 up until September, 2015. 4 Q. What facility were you working at? 5 A. I was working -- I was assigned to Bertie 6 Correctional Institution. 7 Q. What was your job title? 8 A. I was a corrections officer. 9 Q. What were your day-to-day duties or 10 responsibilities? 11 A. Care, custody and control of state 12 offenders. 13 Q. What was your next job? 14 A. I worked at Louisburg College as a campus 15 safety officer from November, 2016 up until January 16 2017. 17 Q. What equipment did you have during that job? 18 A. None. 19 Q. Did you have a taser? 20 A. No. 21 Q. Flashlight? 22 A. I had a personal flashlight, not a 23 department-issued flashlight, on a key chain. 24 Q. Okay. What were your day-to-day 25 responsibilities in that position at Louisburg?</p>	<p>20</p> <p>1 A. Justin White versus North Carolina 2 Department of Public Safety. 3 Q. Do you remember around when that deposition 4 occurred, what time or what date? 5 A. Approximately 2018. 6 Q. Okay. 7 A. Maybe February, January or February, 2018. 8 Q. Thank you. So without revealing any 9 attorney-client communications. I don't want to know 10 anything about that, obviously. How did you prepare 11 for this deposition? 12 A. I prepared with my attorneys of record. 13 Q. Again, without revealing any communications, 14 did you review any documents? 15 A. I reviewed a -- documents with my attorneys. 16 Q. What documents did you review in preparation 17 for the deposition? 18 A. The case documents. 19 Q. Are you talking about what's been filed? 20 A. Yes. 21 Q. Did you review any documents that haven't 22 been filed? 23 A. No. 24 Q. Did you review anything from your personnel 25 file?</p>
<p>19</p> <p>1 A. Observe and report. 2 Q. Was this throughout the entire campus that 3 you worked --- 4 A. Yes. 5 Q. All right. 6 A. I --- 7 Q. After -- I'm sorry. 8 A. After leaving there, I worked at Shaw 9 University full time. My employment started in 10 November -- late November, 2016 up until February 11 late February, 2017. I was a campus security officer. 12 Q. What were your responsibilities at that job? 13 A. Observe and report. 14 Q. And what equipment did you have at that job? 15 A. None. Same thing, I had a flashlight on my 16 personal key chain. 17 Q. Okay. After Shaw University, where did you 18 gain employment? 19 A. I worked part-time in retail and also was 20 able to get unemployment up until I was hired at Vance 21 County Sheriff's Office in June of 2017. 22 Q. And you mentioned that you've been deposed 23 before. How many times have you been deposed? 24 A. Once. 25 Q. What case was that for?</p>	<p>21</p> <p>1 A. What you are provided, yes. 2 Q. Okay. So you've met with your attorneys, 3 you said? 4 A. Yes. 5 Q. Were any non-attorneys present during those 6 preparation sessions? 7 A. No. 8 Q. Were any family members or friends present? 9 A. No. 10 (DEPOSITION EXHIBIT 11 NUMBER 1 WAS MARKED 12 FOR IDENTIFICATION) 13 Q. (Mr. Castro) Okay. So I'm going to bring 14 your attention to Exhibit 1, which the court reporter 15 will share her screen, and also I have provided to 16 your counsel prior to this deposition. And this is 17 the Notice of -- amended Notice of Deposition for this 18 deposition today. Have you seen this? 19 (Witness examines document) 20 A. Can you scroll down? I may have seen it. I 21 may not have seen it. What is the date up there? I'm 22 unable to recall if I've seen it. 23 Q. Okay. 24 A. But I was most certainly told that we had a 25 deposition today.</p>

<p>22</p> <p>1 (DEPOSITION EXHIBIT 2 NUMBER 6 WAS MARKED 3 FOR IDENTIFICATION) 4 Q. Thank you. Skipping over a bit to Exhibit 5 Number 6, which consists of Plaintiff Justin White's 6 response to Defendant Peter White's first set of 7 interrogatories and requests for production. Have you 8 seen this document? 9 (Witness examines document) 10 A. Scroll down. Scroll down. Keep scrolling. 11 Keep on going. Yes. I believe I've seen this 12 document. 13 Q. If you will scroll to the final page. Did 14 you sign a verification? We might have to zoom out. 15 Did you sign this verification? 16 A. Yes. 17 Q. Okay. Thank you. Stepping back out of the 18 exhibits, I want to talk about your employment at 19 Vance County Sheriff's Office. How did you hear about 20 the job position? 21 A. I believe I looked on their website to see 22 if they were hiring. I'm not sure if there was 23 anything up there to indicate such. I contacted the 24 Vance County Sheriff's Office. I asked if they were 25 hiring and they -- can't remember the name, what</p>	<p>24</p> <p>1 A. Yeah. I don't remember if they were -- 2 disclosed. 3 Q. Do you remember if you disclosed previous 4 terminations or suspensions? 5 A. I believe on my F3, I disclosed that I had 6 been previously terminated and reinstated at one job, 7 and then another one I was dismissed as well as a 8 third one. 9 Q. And how was the interview process after you 10 applied? What happened after that? 11 A. In May, Captain Bullock reached out -- 12 Captain Welding Bullock at the time, reached out via 13 telephone and asked me if I was still interested in a 14 position and I said yes, so he invited me for what I 15 thought was going to be an interview with him, but it 16 ended up being a board -- review board with him and 17 two other supervisors. 18 I will say, prior to when I took the 19 application to the Sheriff's Office to deliver to the 20 -- the individual that identified -- his last name is 21 Fryson. So for the purposes of this, Chief Fryson. 22 When I took the application back to the 23 Sheriff's office to deliver it, rather, he knew I was 24 coming. He set up the day, the time. I walked in. I 25 he was told that they was going to give them a buzz, and</p>
<p>23</p> <p>1 reception was, transferred me to an individual who 2 identified himself as the Chief Deputy. 3 Q. Do you know who that person was? 4 A. His name is on the tip of my tongue. I just 5 can't think of it. 6 Q. What did you discuss? 7 A. He identified himself as the Chief Deputy. 8 He said that, "We have a few vacancies," and 9 encouraged me to apply. 10 Q. Okay. And when did you apply for the job, 11 do you remember? 12 A. I believe I applied around March. It could 13 have been March or April, but March or April, 2013. 14 Q. Okay. And when you applied for the job, 15 were you asked to disclose previous lawsuits that you 16 had filed? 17 A. That may have been a question. 18 Q. Do you remember whether you disclosed this? 19 A. I don't recall whether or not anything was 20 disclosed. 21 Q. Does the same go for any EEOC complaints or 22 charges? 23 A. The same for what? 24 Q. That you don't remember if they were 25 disclosed?</p>	<p>25</p> <p>1 Sheriff Peter White walked into the building and he 2 said, "Young man, why are you dressed up?" 3 And I told him, "I have an interview with 4 the chief deputy and Sheriff White said, "Oh, no. I 5 don't have a chief deputy. I have a chief of staff. 6 Is that who you had to see?" And I told him, "Chief 7 Fryson." 8 He said, "I have a chief of staff. I do not 9 have a chief deputy," and Sheriff White said, "And in 10 fact, he's not even sworn." And he said, "I'll take 11 whatever you have." And he said, "Somebody will gi 12 you a call later." 13 So moving forward to May, Captain W. Bullock 14 contacted me, went in for the oral review board. The 15 interviewed me. Captain Bullock told me afterwards 16 that it was successful and I'll be hearing from him 17 soon. 18 Q. And can you spell that person's name? I 19 think you said Riceland or something. 20 A. Fryson. Fryson, with an F. 21 Q. Fryson? 22 A. Yes. 23 Q. And you mentioned a board review. Can you 24 tell me who was in that room? 25 A. Then-Captain Welding Bullock, Lieutenant</p>

<p>26</p> <p>1 Brian Sharon and Lieutenant Lloyd Q. Watkins and I.</p> <p>2 Q. Do you remember what kind of questions were</p> <p>3 asked or conversations were had?</p> <p>4 A. It was surrounding some points of the</p> <p>5 application and the F3. The specific questions I</p> <p>6 cannot recall word for word, but it was around the</p> <p>7 around my hiring and to that effect.</p> <p>8 Q. Was your race mentioned at all during this</p> <p>9 initial board review?</p> <p>10 A. I believe so.</p> <p>11 Q. Okay. So were you eventually offered</p> <p>12 employment?</p> <p>13 A. Yes.</p> <p>14 Q. And when did -- how did you accept the</p> <p>15 offer? Can you go through that process?</p> <p>16 A. Captain Bullock called me, told me that I</p> <p>17 needed to do my drug test, whatever a test -- excuse</p> <p>18 me, told me I need to do the test for the hiring</p> <p>19 process.</p> <p>20 And I met with him in Henderson. We went</p> <p>21 Maria Parham Hospital and I did my test. It later</p> <p>22 came back acceptable, so I was approved to move</p> <p>23 forward. And so he told me that he needed it to --</p> <p>24 needed a few statements in reference to potential</p> <p>25 charges that were shown in the system, as well as</p>	<p>28</p> <p>A. No. I was -- I'm sorry. If I said that, I</p> <p>2 meant to say -- I thought I said Captain Bullock.</p> <p>3 Captain Bullock was the one that was my point of</p> <p>4 contact.</p> <p>5 Q. Okay.</p> <p>6 A. And Sheriff White is the one that told him</p> <p>7 the date: "Sheriff says June 5th."</p> <p>8 Q. Did anyone present you with an employment</p> <p>9 contract to sign?</p> <p>10 A. Yes. An employment contract of two years</p> <p>11 was presented to me.</p> <p>12 Q. What was the -- can you describe how that</p> <p>13 contract looked and what you remember from that</p> <p>14 contract?</p> <p>15 A. The contract had black font, a few pages.</p> <p>16 It was, I believe either like -- it was like a</p> <p>17 bluish-gray color for the paper color, black font.</p> <p>18 It had Sheriff's White's signature. I</p> <p>19 needed -- they needed my signature. It had a place</p> <p>20 for the director of human resources to sign as well as</p> <p>21 the county manager or his designee.</p> <p>22 Q. And what was the title of that document, do</p> <p>23 you remember?</p> <p>24 A. It was my contract. As far as the specific</p> <p>25 information, I can't provide.</p>
<p>27</p> <p>1 needed some sworn or notarized statements in reference</p> <p>2 to my education that's in the Southern New Hampshire</p> <p>3 University online.</p> <p>4 I've never lived in New Hampshire. I</p> <p>5 attended via online. I got things turned into him,</p> <p>6 answered his questions over the phone, and he told me</p> <p>7 that the date will be set soon. And shortly after, he</p> <p>8 contacted me and said, "Sheriff White says it's going</p> <p>9 to be June 5th," my sworn -- swearing-in date, and he</p> <p>10 come dressed up, you know, look professional.</p> <p>11 "Presentable" is what he said. Let me clear</p> <p>12 that up. And so I was sworn in on June 5th by the</p> <p>13 Clerk of Court in Vance County and began work</p> <p>14 afterwards.</p> <p>15 Q. Was June 5th when you think you took the</p> <p>16 oath of office or took an oath regarding your</p> <p>17 position?</p> <p>18 A. I took the oath on June 5th. I believe</p> <p>19 that's the date of June 5th, 2017.</p> <p>20 Q. So you mentioned that the Sheriff called</p> <p>21 you. Do you remember signing any employment contract?</p> <p>22 A. I never said that the Sheriff called me. I</p> <p>23 said that Captain Bullock called me.</p> <p>24 Q. You did say Sheriff White called you to say</p> <p>25 to look presentable?</p>	<p>29</p> <p>Q. Did you read it before you signed it?</p> <p>A. Yes.</p> <p>3 Q. Do you remember what it said?</p> <p>4 A. I just said, I don't know the specific</p> <p>5 information in it, but it was an employment contract</p> <p>6 for two years.</p> <p>7 Q. What's your basis for saying that it's a</p> <p>8 two-year contract?</p> <p>9 A. Because that was in there, and outside of</p> <p>10 the -- not outside of it being in there, I was told --</p> <p>11 I was presented with a two-year opportunity by Capt</p> <p>12 Bullock to work at Vance County for two years to help</p> <p>13 them so they could help me with my experience.</p> <p>14 And also in exchange get, you know, what</p> <p>15 they invested into me and get it out of me. And so he</p> <p>16 asked if I would be willing to do two years at Vance</p> <p>17 County, and I said yes. And after I started, the</p> <p>18 contract was presented to me in writing, I believe the</p> <p>19 same week that I started, for me to sign.</p> <p>20 Q. So when you say Captain Bullock presented</p> <p>21 you with that opportunity, when was that? How did</p> <p>22 that happen?</p> <p>23 A. This was during the hiring process. After</p> <p>24 my -- on the day of my oral review board, the oral</p> <p>25 review panel.</p>

<p>30</p> <p>1 Q. Did anyone else -- keep going. Sorry.</p> <p>2 A. I'm sorry, sir?</p> <p>3 Q. Did anyone else witness this?</p> <p>4 A. It may have been said in the oral review</p> <p>5 panel, but I -- I believe it was said when he told me</p> <p>6 that it was successful, and -- and I remember him</p> <p>7 asking me if I would be willing to commit two years</p> <p>8 Vance County, et cetera.</p> <p>9 Q. Was he -- I would just like to know if you</p> <p>10 would know more specific terminology of what he said?</p> <p>11 So was he saying, "You should stay with us for two</p> <p>12 years. We would appreciate that," or can you give me</p> <p>13 more specifics?</p> <p>14 A. As I previously said, he presented me the</p> <p>15 opportunity to work at Vance County for two years.</p> <p>16 That was orally. It was verbal. He asked me if I</p> <p>17 would be willing to work at Vance County for two years</p> <p>18 to help me with my experience, and that way the</p> <p>19 department could get what they invested in me out</p> <p>20 of me.</p> <p>21 Q. Did Sheriff White ever tell you any of this?</p> <p>22 A. I don't -- I'm unable to recall if Sheriff</p> <p>23 White had said anything about the contract, but I</p> <p>24 believe he said something about, "White, you're at</p> <p>25 home now. You can work, et cetera." But in terms</p>	<p>32</p> <p>1 Q. (Mr. Castro) So let's talk about your</p> <p>2 initial employment when you started working at Vance</p> <p>3 County Sheriff's Office. Did you receive on-the-job</p> <p>4 training?</p> <p>5 A. Yes.</p> <p>6 Q. What kind of training did you receive when</p> <p>7 you started?</p> <p>8 A. I received -- my first week, I rode with</p> <p>9 Sergeant Marin Alexander for a few days, if not the</p> <p>10 entire shift, observing Vance County, getting a feel</p> <p>11 of it because I was new.</p> <p>12 And then the following week, I was told that</p> <p>13 at the time, Sergeant Durwood Campbell, he will be my</p> <p>14 Field Train Officer, FTO. I rode with him somewhere</p> <p>15 around two-and-a-half, three weeks, approximately.</p> <p>16 Afterwards, I was told by Sergeant Campbell</p> <p>17 that I would no longer be with him and I would be --</p> <p>18 that I would be trained by Deputy Brian Kenneth Wayne.</p> <p>19 And Campbell further explained there were</p> <p>20 some issues, some performance issues with one of the</p> <p>21 new trainees as he was trying to get a hang of things</p> <p>22 for the county and some performance issues with Deputy</p> <p>23 Wayne. Campbell provided information that Wayne</p> <p>24 worked at the Highway Patrol and something happened</p> <p>25 to him and it was later provided to me that Wayne was</p>
<p>31</p> <p>1 specifications about the contract, that was more so</p> <p>2 Captain Bullock verbally asking me if I would commit</p> <p>3 two years.</p> <p>4 Q. So do you have a copy of that contract?</p> <p>5 A. I'm unable to find it.</p> <p>6 Q. Do you remember asking for a copy when you</p> <p>7 signed it?</p> <p>8 A. I believe they gave me a copy.</p> <p>9 Q. Where would you normally keep those type of</p> <p>10 documents?</p> <p>11 A. I would keep them at my house.</p> <p>12 Q. Do you have a specific area where you keep</p> <p>13 contracts like that?</p> <p>14 A. I keep them with my important paperwork.</p> <p>15 That's where I'd normally keep my stuff.</p> <p>16 Q. Is there any reason that your important</p> <p>17 paperwork would go missing?</p> <p>18 A. Well, yes. I moved a few times since living</p> <p>19 in Vance County when I was a Sheriff's deputy and</p> <p>20 things got lost.</p> <p>21 Q. So you do not have a copy of the contract?</p> <p>22 A. I'm unable to find it.</p> <p>23 MS. ROBINSON: I'm going to object to</p> <p>24 this point. That's asked and answered. You asked</p> <p>25 that same question three times.</p>	<p>33</p> <p>1 terminated for -- from the Highway Patrol.</p> <p>2 And so instead of singling Wayne out,</p> <p>3 Campbell said that the Sheriff and then Captain</p> <p>4 Lawrence Bullock, who later became Chief Deputy, was</p> <p>5 just swap -- switching everybody, swapping everybody</p> <p>6 around, and I was going to Wayne.</p> <p>7 Q. Before I ask you more questions about that,</p> <p>8 I wanted to go back to what we discussed before. You</p> <p>9 said Sheriff White said, "You are at home now," when</p> <p>10 you were hired. Is that right?</p> <p>11 A. Yes.</p> <p>12 Q. What did you take from that statement, or</p> <p>13 how did you react to that statement?</p> <p>14 A. I pulled up to the Sheriff's Office.</p> <p>15 Sheriff White saw me. It was one of the days that</p> <p>16 Captain Bullock asked me to come in, and Sheriff</p> <p>17 White, he approached me. He said -- he said, "Mr.</p> <p>18 White." He spoke, he said, Mr. White." He said, "I</p> <p>19 went over a lot of paperwork about you."</p> <p>20 I said, "Okay." He said, "What happened at</p> <p>21 the prison?" And I told him that they had --</p> <p>22 previously terminated me, but I was reinstated. And</p> <p>23 he asked what had happened at Louisburg, and I told</p> <p>24 him. I said, "I don't know. They ended the</p> <p>25 employment contract." And he said, "Okay." He said</p>

<p>34</p> <p>1 "Don't worry." He said, "You home now." 2 Q. Do you think he was being sincere from what 3 you could tell? 4 A. I have no reason to -- to say otherwise. 5 Q. All right. Back to what we were discussing 6 about training. Did you hear what happened with Wayne 7 about the performance issues? 8 A. Yes. Sergeant Campbell provided the 9 information. 10 Q. What was that information? 11 A. As I previously stated, hat there were 12 performance issues involving him and his trainee. 13 -- and Sergeant Campbell stated something to the 14 effect that there was -- there's a difference in the 15 Highway Patrol, what he referred to as "HP," and 16 "SO," which is the Sheriff's Office. 17 He said that our responsibilities are -- are 18 different from a State Trooper's responsibility. He 19 also said that the deputy was -- I believe it was 20 Deputy Brian Sharon. 21 Not Lieutenant Bryan Sharon, but Deputy 22 Brian Sharon. Somebody different, so those two are 23 not the same, was having problems in answering calls, 24 getting to calls, directions, etc. And he was asking 25 Deputy Wayne for help and Deputy Wayne would</p>	<p>36</p> <p>1 A. Campbell was -- Campbell was referring to 2 Deputy Brian Sharon asking Wayne for help, and 3 Campbell stated he heard that Wayne would not help 4 him. 5 Q. Did Campbell explain why that was a problem? 6 A. Campbell was basically repeating what he was 7 told by other parties at the Sheriff's Office. 8 Q. In your experience as a law enforcement 9 officer, do you see where there would be a problem if 10 one deputy would refuse to help another? 11 A. Yes. That would be a problem, but it would 12 also depend on the circumstances. So if -- if a 13 deputy needs help in terms of out there in the field, 14 then you must respond. Okay? But if that deputy 15 wants to just get out of work and get you to answer 16 their calls and whatnot, that's going to be an issue 17 that has to be addressed. 18 Q. So what about when you must respond? And 19 let's say Wayne did not respond or Brian Sharon did 20 not respond in that situation, would that be an issue? 21 A. Yes, it would be an issue. 22 Q. Why is that? 23 A. If somebody is calling for help in the 24 field, you got to provide backup. If they -- for the 25 facts of this situation, upon information and belief,</p>
<p>35</p> <p>1 him. 2 And according to Sergeant Campbell, Deputy 3 Sharon went and talked to Chief Lawrence Bullock, 4 who was the Patrol Captain at the time. And according 5 to Campbell, he went to Sheriff White and the decision 6 was made to switch everyone around, instead of just 7 taking Deputy Sharon from Wayne; to switch everyone 8 around so it was -- Gerald Ladder(ph) was a deputy 9 Deputy Brian Sharon and I. We were all swapped. 10 Q. So there's some things to unpack from what 11 you said. So Campbell told you that there's a 12 difference between the Highway Patrol and the SO. 13 What were those differences that he described? 14 A. He didn't go into detail, not major. He 15 didn't elaborate on it significantly. He just said 16 that there was a difference in the Highway Patrol 17 and the Sheriff's Office. 18 Q. You mentioned that he said the 19 responsibilities are different. Do you know what 20 responsibilities he was referring to? 21 A. He just said that the responsibilities are 22 different. 23 Q. So you also mentioned that when someone 24 asked Wayne for help, it was alleged that Wayne would 25 not help them. Do you think that ---</p>	<p>37</p> <p>1 Deputy Brian needed further assistance in terms of 2 answering calls, report writing, getting to calls, the 3 directions, et cetera. 4 And he felt that, as alleged, that he wasn't 5 being provided the level of training that he needed by 6 and from Deputy Wayne, allegedly. 7 Q. Understood. Okay. So did you review any 8 materials in connection with your training or as part 9 of the on-boarding process? 10 A. When you say, "on-boarding process," are you 11 referring to personnel management or human resource 12 on-boarding process in terms of orientation? 13 Q. Yes. Let's start there. 14 A. Okay. During county orientation, the 15 policies and procedures for the county, for Vance 16 and County itself, were provided. The policies and 17 procedures for the Vance County Sheriff's Office were 18 not provided. 19 Q. Were the policies and procedures of the 20 Sheriff's Office ever provided to you? 21 A. Excuse me. The employee handbook of the 22 Sheriff's Office was never provided to me as a Deputy 23 Sheriff. 24 Q. Were you ever told to read some of the 25 provisions in that handbook?</p>

<p>38</p> <p>1 MS. ROBINSON: Mr. Castro? We've been</p> <p>2 going now for about an hour. Do you mind taking a</p> <p>3 recess, scheduling it maybe within the next five</p> <p>4 minutes?</p> <p>5 MR. CASTRO: That's fine with me.</p> <p>6 MS. ROBINSON: Okay.</p> <p>7 MR. CASTRO: Thank you.</p> <p>8 THE COURT REPORTER: We are now off the</p> <p>9 record. The time is 11:05.</p> <p>10 (Brief recess: 11:05 a.m. to 11:14 a.m.)</p> <p>11 THE COURT REPORTER: We are now back on</p> <p>12 the record. The time is 11:14 a.m.</p> <p>13 Q. (Mr. Castro) All right. We were discussing</p> <p>14 the materials you reviewed when you first started</p> <p>15 working at the Vance County Sheriff's Office. What</p> <p>16 documents did you review as part of the on-boarding</p> <p>17 process other than the County Policy Manual?</p> <p>18 MS. ROBINSON: And let me just object</p> <p>19 and say, can you just kind of clarify the on-boarding</p> <p>20 process? Because there was orientation, there was</p> <p>21 different processes, and so just some clarities.</p> <p>22 Q. (Mr. Castro) Yes. I was speaking generally</p> <p>23 and I would like to walk through each of those</p> <p>24 processes, so from orientation to when you started</p> <p>25 on-the-job training. So let's start with orientation?</p>	<p>40</p> <p>1 Nothing up there was written except for</p> <p>2 signatures. There were no special notes, so I believe</p> <p>3 that somebody went in there and wrote something that</p> <p>4 should not have been written, especially after I've</p> <p>5 seen my personnel file and it wasn't up there.</p> <p>6 Q. When you say they wrote something, what did</p> <p>7 they write that shouldn't have been in there?</p> <p>8 A. I saw numerous things. I believe there was</p> <p>9 something in there about reviewing -- possibly</p> <p>10 reviewing Sheriff's Office policies and et cetera.</p> <p>11 I -- I can't remember everything off top of</p> <p>12 my head, but there were things in there that was</p> <p>13 written that was not on those forms when I reviewed</p> <p>14 personnel file with her.</p> <p>15 She -- she even admitted that it was barely</p> <p>16 -- there's barely nothing in here. But yet when they</p> <p>17 contested my unemployment, all of a sudden they got</p> <p>18 files, and then there's -- somebody went in there and</p> <p>19 handwrote stuff on those PDF or Word documents.</p> <p>20 Q. What do you base that -- you said, "upon</p> <p>21 information and belief." What information are you</p> <p>22 basing this off of?</p> <p>23 A. It was not there before, and all of a sudden</p> <p>24 it's there now.</p> <p>25 Q. Who do you think inserted this information?</p>
<p>39</p> <p>1 A. The orientation process consisted of</p> <p>2 then-Director Argretta Johen, she may still be there,</p> <p>3 provided orientation for county policies -- for</p> <p>4 advanced county policy, not policy specific to</p> <p>5 anyone's department or office.</p> <p>6 She provided -- to answer your question</p> <p>7 before the objection, there were benefits:</p> <p>8 documentation, medical, dental -- benefits. There may</p> <p>9 or may not have been some compensation -- compensation.</p> <p>10 documents that she went over. But that was based on</p> <p>11 general policy for Vance County as a whole, not</p> <p>12 specific to Vance County Sheriff's Office.</p> <p>13 Q. Okay. And moving on to when you started</p> <p>14 working and training, initially, were you told to</p> <p>15 review any sheriff-specific documents?</p> <p>16 A. That's the issue. I remember the County HR</p> <p>17 Director providing county policy. When I was</p> <p>18 terminated, Argretta Johen submitted evidence to the</p> <p>19 unemployment commission and she had items asterisked</p> <p>20 or starred written on a document that was typed.</p> <p>21 But she handwrote in, upon -- allegedly,</p> <p>22 upon information and belief. Because when I -- when I</p> <p>23 reviewed my personnel file with her around the time of</p> <p>24 my complaints, my personnel file that she had was</p> <p>25 very, very thin, a few pages.</p>	<p>41</p> <p>1 A. Well, she was the one -- initially the one</p> <p>2 that contested it, so it could have been her. However,</p> <p>3 I can't speculate, but it was somebody at Vance County</p> <p>4 that submitted it to the unemployment commission to</p> <p>5 challenge my benefits.</p> <p>6 Q. Do you know if the Sheriff was involved in</p> <p>7 this process at all?</p> <p>8 A. Counselor, I don't know who was involved.</p> <p>9 Q. Okay. So going back to what you actually</p> <p>10 reviewed when you started training and taking what you</p> <p>11 just said, obviously, what documents did you review</p> <p>12 when you started training at the Sheriff's Office, if</p> <p>13 any?</p> <p>14 A. I -- I reviewed an incident report,</p> <p>15 operations report. Campbell taught me how to do --</p> <p>16 how to serve warrants, how to return the warrants,</p> <p>17 things of that nature. In terms of a Vance County</p> <p>18 Sheriff's Office employee handbook or a manual, that</p> <p>19 I know has never provided to me.</p> <p>20 Q. Okay.</p> <p>21 A. And when I say Campbell, I'm talking about</p> <p>22 Sergeant Durwood Campbell, my field training officer</p> <p>23 at the time.</p> <p>24 Q. Ignoring the handbook, did Sheriff White</p> <p>25 speak to you orally about the practices and policies</p>

<p>42</p> <p>1 of the Sheriff's Office?</p> <p>2 A. Let me think. Sheriff White did speak to me</p> <p>3 about some of the practices and procedures of the</p> <p>4 Sheriff's Office after I was complained on by a</p> <p>5 citizen who had a fender bender, a minor collision</p> <p>6 with another citizen.</p> <p>7 I believe it was a black female and a</p> <p>8 Hispanic male. And he spoke briefly about that,</p> <p>9 saying that I had to go back and charge this man, when</p> <p>10 I felt that he should not have been charged because</p> <p>11 didn't do anything.</p> <p>12 And then he had spoken to me a few months</p> <p>13 later about traffic enforcement and warrants and</p> <p>14 checking businesses, et cetera. But early on during</p> <p>15 this whole on-boarding process and field training as</p> <p>16 you were referring to, but to cover my basis so that</p> <p>17 there's no perjury, I brought that in. He had not</p> <p>18 said anything at that point in time. But later on, he</p> <p>19 did.</p> <p>20 Q. Do you remember when this fender bender</p> <p>21 incident occurred approximately?</p> <p>22 A. I believe it occurred in -- somewhere maybe</p> <p>23 around November or December. Maybe December</p> <p>24 Somewhere around that time.</p> <p>25 Q. All right. Were there any other discussions</p>	<p>44</p> <p>1 "Follow me down here," because she was being truthf</p> <p>2 And so she followed me down there. I was able to</p> <p>3 verify that it wasn't her. Instead, one of her family</p> <p>4 members and they have similar identification.</p> <p>5 But her mom was upset that it was her</p> <p>6 daughter. And I explained to her that I had to verify</p> <p>7 the warrant and et cetera, and it wasn't her. So her</p> <p>8 mom wanted to know, "Well, why is my daughter down</p> <p>9 here instead of the guy that hit her?"</p> <p>10 And I told her, I said, "Well, the reason's</p> <p>11 as I've just stated. That's why your daughter's</p> <p>12 here." "Well -- well, why isn't he here?" I said,</p> <p>13 "Well, ma'am." I said, you know, "I didn't feel as if</p> <p>14 he did anything wrong." I said, "And there's no</p> <p>15 damage to the car."</p> <p>16 And she wanted a report and I said, "We can</p> <p>17 get a report." And so she -- and the mother wanted</p> <p>18 the young lady to be -- the young man to be charged,</p> <p>19 and Sheriff White told me to go back and charge him</p> <p>20 And I said, "Well, Sheriff, I don't have a</p> <p>21 ticket book." And he said, "You don't have a ticket</p> <p>22 book?" I said, "No." He said, "All of them degrees</p> <p>23 you got?" Scratching his head. I said, "No, Sheriff.</p> <p>24 I don't have a ticket book." "White, I thought I gave</p> <p>25 you a ticket book." I said, "No, Sheriff. You didn't</p>
<p>43</p> <p>1 with Sheriff White about the policies and practices of</p> <p>2 the office that you can remember?</p> <p>3 A. He may have said something else down the</p> <p>4 road, maybe pertinent to my complaints and him</p> <p>5 allegedly addressing it. But based on what I remember</p> <p>6 at this time, I think I covered the basis.</p> <p>7 Q. Okay. You mentioned that you might have had</p> <p>8 a discussion about traffic enforcement. Do you</p> <p>9 remember what the discussion was and when it was had?</p> <p>10 A. Yes. In reference to the wreck on or about</p> <p>11 December 2017, Sheriff White received a complaint</p> <p>12 a African-American female. Her mother actually</p> <p>13 the verbal complaint and then her daughter start</p> <p>14 speaking, and Sheriff White asked me in front of the</p> <p>15 to -- to address it.</p> <p>16 And I did. And I told them that he should</p> <p>17 not have been -- that the reason why is -- I told her</p> <p>18 -- her mother, "The reason why your daughter's down</p> <p>19 here is because Central was showing a possible warrant</p> <p>20 in the system and I need to verify."</p> <p>21 Because she told me that she had never been</p> <p>22 in trouble and I did not see any signs of deception,</p> <p>23 but I need to verify who she was and that's why she</p> <p>24 was at the Sheriff's Office.</p> <p>25 I didn't cuff her. I told her -- I said,</p>	<p>45</p> <p>1 give me a ticket book. I don't have one."</p> <p>2 And so the Sheriff told me to charge him on</p> <p>3 Criminal Summons since I don't have a ticket book.</p> <p>4 And I asked the Sheriff, "What do you want me to</p> <p>5 charge him with?" And the Sheriff started scratching</p> <p>6 his head, and he told me he would speak to me in his</p> <p>7 office in a few so we can get all the stuff sorted</p> <p>8 out.</p> <p>9 And we did. And Sheriff White said, "Well,</p> <p>10 White." He said, "Where the Supervisor?" I said,</p> <p>11 Supervisor not here today." He said, "Well, White,</p> <p>12 you the senior deputy. All these degrees and</p> <p>13 certifications you got." And he said, "I thought I</p> <p>14 gave you a ticket book." And I said, "No, Sheriff. I</p> <p>15 -- you didn't."</p> <p>16 And he told me to charge them and I said,</p> <p>17 "Well, Sheriff, you know, it's a trash site." I said,</p> <p>18 "It could be construed as -- it may be considered</p> <p>19 private property." I said, "And I don't think the</p> <p>20 charges are going to go anywhere because there's no</p> <p>21 damage to the car."</p> <p>22 And so the Sheriff said, "Well, just -- just</p> <p>23 charge him because these people can go to the</p> <p>24 hospital, run up insurance, et cetera. You don't know</p> <p>25 what may happen." I said, "Yes, Sheriff." So I went</p>

<p>46</p> <p>1 and I put it on Criminal Sermons -- Criminal Summons.</p> <p>2 And the Magistrate Judge, she did not like</p> <p>3 what she saw. And I said, "Ma'am," I said, "This is</p> <p>4 coming directly from the Sheriff. He wants this man</p> <p>5 charged. Somebody came in here -- complaining, so</p> <p>6 that's why I'm here for you to find P.C.</p> <p>7 She signed off on it. I served the dude</p> <p>8 with a Criminal Summons and that was it. But the</p> <p>9 sheriff told me to do Traffic Enforcement, and then</p> <p>10 another time that he told me to do Traffic Enforcement</p> <p>11 was in his office.</p> <p>12 And he said something to the effect of, "We</p> <p>13 do stock cars." But he wanted us to be focused on</p> <p>14 as well, on -- and then some more focus on as well,</p> <p>15 checking bills -- on businesses and buildings, serving</p> <p>16 warrants, serving papers, et cetera. But traffic</p> <p>17 enforcement was and it -- well, was a part of my job</p> <p>18 when I was there.</p> <p>19 Q. So going back to the -- you said it was an</p> <p>20 African-American female that you were speaking with</p> <p>21 Was there a possible warrant in the system at that</p> <p>22 time?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And were you issued a ticket book</p> <p>25 after this occurred?</p>	<p>48</p> <p>1. A. Briefly, he said a few things to the effect</p> <p>2 of, when we answer calls on his shift, he let the guys</p> <p>3 do, and the one girl he has, whatever they want to do</p> <p>4 as long as they answer calls.</p> <p>5 He said a few of them had been there a</p> <p>6 while. They're waiting on to go through BLET. He</p> <p>7 said that he expects for his guys to work because</p> <p>8 he'll work. Call come out, he'll respond to it.</p> <p>9 He did say that absent of a lot of calls,</p> <p>10 it's pretty much laid back. You got free will to do</p> <p>11 whatever as long as you don't go out here and do</p> <p>12 anything that's too crazy or stupid, left to center.</p> <p>13 He did say that he liked to pull over cars,</p> <p>14 and we pulled over several cars while I was riding</p> <p>15 with him my first week, as well as his uncertified</p> <p>16 deputies were pulling over cars.</p> <p>17 And I know they pulled them over because I</p> <p>18 could hear them on the radio, and then several times,</p> <p>19 we backed them up on traffic stops. In fact, Sergeant</p> <p>20 Alexander said, "You might come to my shift. I don't</p> <p>21 know." He said, "I need a certified officer." And he</p> <p>22 said, "Currently, the only two on shift that's</p> <p>23 certified is you and I."</p> <p>24 Q. And when you say they stopped cars, do you</p> <p>25 know for what types of violations they would stop the</p>
<p>47</p> <p>1 A. No.</p> <p>2 Q. Did you ask for a ticket book?</p> <p>3 A. I never asked him for a ticket book. And</p> <p>4 the sheriff admitted that he knew I didn't ask him for</p> <p>5 a ticket book, and later said, despite after saying</p> <p>6 that he thought he gave me a ticket book, he said, "If</p> <p>7 I wanted you to have a ticket book, you would have</p> <p>8 one." So which one is it...</p> <p>9 Q. But you didn't have one?</p> <p>10 A. No, I did not.</p> <p>11 Q. Okay. Do you know why you were not issued</p> <p>12 ticket book?</p> <p>13 A. The Sheriff stated to me he thought he'd</p> <p>14 issued me a tissue -- a ticket book. He later said if</p> <p>15 he wanted me to have a ticket book, then he would give</p> <p>16 me one. So I guess it was at the discretion of the</p> <p>17 Sheriff.</p> <p>18 Q. So in his discretion, he did not issue you a</p> <p>19 ticket book thereafter?</p> <p>20 A. No.</p> <p>21 Q. I wanted to talk about the policies and</p> <p>22 procedures that others may have talked to you about.</p> <p>23 So you mentioned that you received training with</p> <p>24 Alexander, Sergeant Alexander. Did he discuss any</p> <p>25 policies and procedures with you?</p>	<p>49</p> <p>1 cars for?</p> <p>2 A. Chapter 20 Motor -- Motor Vehicle</p> <p>3 Violations. Various ones.</p> <p>4 Q. Can you name any specifically?</p> <p>5 A. In terms of the specific names, you will</p> <p>6 have to get the reports from the Vance County</p> <p>7 Sheriff's Office. Some of this stuff is three years</p> <p>8 old, if not longer.</p> <p>9 Q. I understand that. So when it came to</p> <p>10 traffic enforcement, did Sergeant Alexander discuss</p> <p>11 the difference between a minor or a major violation?</p> <p>12 A. No, he did not.</p> <p>13 Q. Ignoring the traffic enforcement issue, were</p> <p>14 there any other policies and practices discussed that</p> <p>15 you haven't mentioned by Sergeant Alexander?</p> <p>16 A. Not to my knowledge. I believe I recalled</p> <p>17 everything I could.</p> <p>18 Q. Understood. So your Field Training Officer</p> <p>19 Campbell. Can you tell me what types of policies and</p> <p>20 practices he talked to you about during your training?</p> <p>21 A. He talked about serving warrants, making</p> <p>22 sure that we check our buildings, being to work on</p> <p>23 time, not calling out habitually. He talked about</p> <p>24 just getting the job done and everybody going home</p> <p>25 safe.</p>

<p>50</p> <p>1 Campbell also -- he said, "I'm sort of a 2 traffic guru." He said, "I work not just here, but 3 also with a police department," whichever one it was, 4 somewhere in Warren County. And he said, "I like to 5 serve warrants too."</p> <p>6 And in fact, Campbell and I pulled over 7 multiple cars during my two-and-a-half to three weeks 8 with him. In fact, him and I had a chase, a vehicle 9 chase, through the county and the city while I was 10 still in field training with him. So traffic 11 enforcement was definitely instilled in -- by him, 12 stated and we acted on it.</p> <p>13 Q. And you said you pulled over multiple cars. 14 Can you give me examples of why you pulled them over, 15 or why he decided that they would be pulled over?</p> <p>16 A. Once more, you would have to get the reports 17 from the Vance County Sheriff's Office. I will say 18 there was less than a handful of times when we pulled 19 cars over where he told me not to say anything on the 20 radio or -- or he wouldn't call it in.</p> <p>21 He would just handle it without dispatch 22 knowing. He never said why, other than he said, "We 23 don't have to call it in." And he would approach the 24 car and I would be there. I remember one time on 25 39 -- we were headed south, but it was 39 North.</p>	<p>52</p> <p>1 had them. So to answer your question, all the 2 sergeants had one.</p> <p>3 Q. So when you were riding with Sergeant 4 Alexander, were -- you remember pulling people over 5 for speeding?</p> <p>6 A. There were multiple traffic stops that 7 Sergeant Alexander did. If you want the specific 8 charges, the reason of suspicion or the probable cause 9 for the stop and possible arrest, then you would have 10 to rely on the reports from the Sheriff's Office. 11 It's been too long.</p> <p>12 Q. Based on your recollection, do you remember 13 stopping anyone for speeding with Campbell or 14 Alexander?</p> <p>15 A. Like I said, it's -- the -- it will be based 16 on the reports at the Sheriff's Office in terms of 17 specific recollection of what somebody was stopped 18 for, whether it was speeding or another Chapter 20 19 violation. I'm unable to recall the specifications, 20 but there were multiple traffic stops that were done, 21 not just with Alexander but also with Campbell.</p> <p>22 Q. Okay. So moving on, did the Sheriff's 23 Office assign people to different squads or teams?</p> <p>24 A. Yes.</p> <p>25 Q. What squad were you on when you initially</p>
<p>51</p> <p>1 But we was in the southbound lane and he 2 told me to pull a car over who was following too 3 closely. They was going -- they were going slow, but 4 -- at one point in time, but then they sped up to 5 about the speed limit and they were following closely, 6 and so he told me to pull them over.</p> <p>7 And so he told me to stay in the car and he 8 went and handled it. And when he came back, he 9 provide what was going on with the motorist, but I 10 unable to recall what he said.</p> <p>11 Q. Do you know if he had a traffic or a 12 citation book?</p> <p>13 A. I'd never seen his traffic book, but he was 14 a supervisor, and so it is fair to say that he had 15 one, most likely.</p> <p>16 Q. Do you know if Sergeant Alexander had one?</p> <p>17 A. He was a supervisor, so he had one, most 18 likely. And I'm saying "most likely" based on because 19 Sheriff White had told me face-to-face before, well 20 after these incidents, when he said, "You don't have 21 -- he said, "I know you don't have a ticket book. I 22 I wanted you to have one, you would have one."</p> <p>23 He said, "Well, the supervisors got one."</p> <p>24 So sergeants, lieutenants, captains, chief deputy or 25 major and the sheriff, they got ticket books. They</p>	<p>53</p> <p>1 started?</p> <p>2 A. I rode with Sergeant Alexander for one week. 3 The following week, I was assigned to Sergeant 4 Campbell, Campbell's squad. The squads were A, B, 5 and D. Whichever one Sergeant Alexander was on and 6 whichever one Campbell was on.</p> <p>7 And later after Campbell, then in field 8 training with Deputy Wayne, I was under Sergeant 9 Mr. Donald Roberson. Whatever squad number at that time 10 at 2017, I identified their squad or team, that's the 11 one I was on.</p> <p>12 Q. Okay. Who was on -- what other deputies 13 were on your squad with Alexander? Do you remember</p> <p>14 A. We had Deputy Terry Torrance, who was 15 uncertified at the time. We had Deputy Lauren. I 16 cannot think of her last name, but she was also 17 uncertified. And you had Deputy Cody Burns, also 18 uncertified, along with -- along with Sergeant 19 Alexander.</p> <p>20 I will say for the record, those are his 21 shift members at the time, but during the time that I 22 was a law -- that I was hired, it was around the 23 summer. So school was either in the process of being 24 let out or already let out, and so there were SR roles 25 that were split up for each shift. I am unable to</p>

<p>54</p> <p>1 recall which SR role was assigned, but it was -- it</p> <p>2 did happen.</p> <p>3 Q. And do you remember the same for Campbell's</p> <p>4 squad, who else was on there?</p> <p>5 A. Some of them I do. It was Campbell,</p> <p>6 Sergeant Campbell, Deputy Adam Height, certified</p> <p>7 Deputy Andre Pool, certified. And if there were any</p> <p>8 other people on his shift, it's not coming to my</p> <p>9 memory at this time.</p> <p>10 Q. Okay. And finally, for -- is it Roberson?</p> <p>11 A. Sergeant Donald Roberson. He goes by D Ray</p> <p>12 (phonetic). Yes. It was Sergeant Roberson, Deputy</p> <p>13 Wayne. There was another deputy. It's on the tip</p> <p>14 of -- it's on the tip of my tongue. It might come to</p> <p>15 me.</p> <p>16 He was referred to as Sergeant Roberson's</p> <p>17 Senior Deputy, an African-American male. I can't</p> <p>18 think of his name, and it was a -- it was Deputy Eric</p> <p>19 Sheftal. Eric Sheftal.</p> <p>20 Q. Do you know how to spell his last name?</p> <p>21 A. S-H-E-F-T-A-L, I believe.</p> <p>22 Q. Okay. Did you know any of those people that</p> <p>23 you just mentioned before you started working at the</p> <p>24 Vance County Sheriff's Office?</p> <p>25 A. I knew of Andre Pool.</p>	<p>56</p> <p>1 personal friendship or relationship, no.</p> <p>2 Q. Okay. Did you know him after BLET or stay</p> <p>3 in contact?</p> <p>4 A. No. I did not stay in contact with him</p> <p>5 after B -- BLET. It was only until he saw me right</p> <p>6 before I got hired at the Sheriff's Office. He</p> <p>7 recognized me and I recognized him. So there was no</p> <p>8 contact after BLET up until getting hired at the</p> <p>9 Sheriff's Office.</p> <p>10 Q. So once you got hired, would you two hang</p> <p>11 out outside of your work hours?</p> <p>12 A. No, we did not hang out. I'm not a person</p> <p>13 that hangs out. Define "hang out."</p> <p>14 Q. Spend time with, lunch, dinner. Spend time</p> <p>15 at each other's homes, et cetera.</p> <p>16 A. We had lunch sometimes at the Sheriff's</p> <p>17 Office together, as well as I had lunch with a few</p> <p>18 other deputies, I mean -- and supervisors a few times.</p> <p>19 But in terms of hang out, in terms of, like, going to</p> <p>20 a club or bar, lounge or shopping, no.</p> <p>21 In terms of spending time at one another's</p> <p>22 house, I did not spend time at his house per se in</p> <p>23 terms of hanging out there, but I definitely knew</p> <p>24 where he stayed at. But our interactions off-duty,</p> <p>25 face-to-face was limited.</p>
<p>55</p> <p>1 Q. Is that the only person?</p> <p>2 A. Yes.</p> <p>3 Q. How did you know of him?</p> <p>4 A. We went through basic law enforcement</p> <p>5 training together at College of the Albemarle in</p> <p>6 Elizabeth City, North Carolina back in August, 2015</p> <p>7 December, 2015.</p> <p>8 Q. Did you talk to him during that time, or you</p> <p>9 just went to the same classes?</p> <p>10 A. That's the first time I met him, when we</p> <p>11 went through the police academy, which is BLET.</p> <p>12 Q. Would you consider yourselves friends? Were</p> <p>13 you talking, were you hanging out outside of --</p> <p>14 A. I guess we were co-workers -- I guess we</p> <p>15 were co-workers or classmates. We both were in the</p> <p>16 law enforcement academy.</p> <p>17 Q. Did you have conversations outside of the</p> <p>18 academy?</p> <p>19 A. Are you talking about during the academy?</p> <p>20 Q. During that time, would you hang out or talk</p> <p>21 to him outside of that?</p> <p>22 A. No. We wouldn't hang out at all outside of</p> <p>23 the academy. There may have been times where the</p> <p>24 class went to lunch or something and him and I were</p> <p>25 there along with others. But in terms of having a</p>	<p>57</p> <p>1 Q. Did you send text messages to each other</p> <p>2 off-duty?</p> <p>3 A. There were messages exchanged</p> <p>4 back-and-forth: "Hello." "How are you?" "What's u</p> <p>5 man?" Things of that nature.</p> <p>6 Q. How about phone calls?</p> <p>7 A. There were phone calls, as well as text</p> <p>8 messages and phone calls with a few other deputies</p> <p>9 that -- when I was off duty.</p> <p>10 Q. After your termination, did you remain in</p> <p>11 contact with Mr. Poole?</p> <p>12 A. Yes.</p> <p>13 Q. Do you -- not to use the terminology, "hang</p> <p>14 out," but spend time with one another, lunch, dinner?</p> <p>15 A. Well, no. Well, where I live. I live in --</p> <p>16 I live in Charlotte. He stays in Vance County.</p> <p>17 That's a three-hour-plus difference, so no.</p> <p>18 Q. How about text or talk?</p> <p>19 A. We text and sometimes we talk.</p> <p>20 Q. Did you talk to him about your termination</p> <p>21 or your employment at Vance County Sheriff's Office?</p> <p>22 A. Yes. He was the one that told me the reason</p> <p>23 why I was terminated after Captain Weldon Bullock</p> <p>24 stated Sheriff Peter White told him not to talk about</p> <p>25 it. And so maybe a week later, then Deputy Poole</p>

<p>58</p> <p>1 found out why I was terminated and let me know.</p> <p>2 Q. What did he tell you?</p> <p>3 A. He let me know that I was terminated for</p> <p>4 excessive force. I asked him where did he get the</p> <p>5 information from, and he stated that Captain Lloyd</p> <p>6 well, Captain Watkins, but Lloyd Q. Watkins is the</p> <p>7 name, told him.</p> <p>8 And he also stated that Captain Watkins</p> <p>9 said, "The Sheriff wanted him gone." He don't agree</p> <p>10 with the decision to terminate me, "but the Sheriff</p> <p>11 didn't want his services anymore." And so Poole</p> <p>12 me.</p> <p>13 Fast-forward, Algretta challenged my</p> <p>14 unemployment benefits, and there were some things</p> <p>15 some files that she sent over that were sent to me.</p> <p>16 And the allegations of excessive force, what was</p> <p>17 written on paper, it was true.</p> <p>18 Q. So Poole told you about the excessive force.</p> <p>19 Did he mention any discrimination at play?</p> <p>20 A. No. He simply told me -- he didn't mention</p> <p>21 discrimination by word, but he simply told me that</p> <p>22 Captain Watkins told him that I was terminated for</p> <p>23 excessive force. He told me that Captain Watkins</p> <p>24 him that he did not agree with the decision, said that</p> <p>25 "The Sheriff wanted him gone."</p>	<p>60</p> <p>1 2017. Is that correct, does that sound about right?</p> <p>2 A. Yeah. It sounds approximately -- yes.</p> <p>3 Q. What led up to this transfer, do you know?</p> <p>4 A. Yes. I was told by Sergeant Campbell, as he</p> <p>5 -- was in the process of becoming Lieutenant Campbell</p> <p>6 around that time, that I was being transferred because</p> <p>7 there are some people who are getting ready to go</p> <p>8 through BLET, Basic Law Enforcement Training. And</p> <p>9 they were going to do this swap of deputies in the</p> <p>10 next couple of weeks.</p> <p>11 Q. Do you know what was the purpose of the</p> <p>12 swap?</p> <p>13 A. Because deputies were getting ready to go to</p> <p>14 BLET, is what Campbell told me.</p> <p>15 Q. Did you have any issues with being</p> <p>16 transferred?</p> <p>17 A. Based on what he had told me, I had no</p> <p>18 issues based on what he told me. But I later had</p> <p>19 issues based on when I found out the truth.</p> <p>20 Q. Can you tell me how that happened?</p> <p>21 A. How what happened?</p> <p>22 Q. How you allegedly found out the truth?</p> <p>23 A. I did find out the truth, and the truth is,</p> <p>24 I was transferred from Sergeant Roberson's shift to</p> <p>25 Sergeant Alexander's shift.</p>
<p>59</p> <p>1 And I asked him, I said, "Well, what are you</p> <p>2 talking about, wanting me gone?" "You know, because</p> <p>3 you went to HR and the Sheriff didn't like that." And</p> <p>4 he said, "All of us know what took place." Then, he</p> <p>5 said, "I just wanted to tell you that you would --</p> <p>6 that you were terminated for excessive force."</p> <p>7 Q. Did he explain why the Sheriff wanted you</p> <p>8 gone? Was it just because you went to HR?</p> <p>9 A. That's what he said. There may have been</p> <p>10 other things that may have been mentioned that he</p> <p>11 didn't tell me, but that most certainly, what I just</p> <p>12 told you, was an accurate account of what was said.</p> <p>13 Q. Thank you.</p> <p>14 A. But for Watkins telling him that I was</p> <p>15 terminated for excessive force, I would not know that</p> <p>16 I was terminated for excessive force because Captain</p> <p>17 Bullock did not talk about it to me. Nobody did.</p> <p>18 I was simply told on the day of my dismissal</p> <p>19 that, "Your service is no longer needed," and the</p> <p>20 Sheriff said not to talk about it. They didn't give</p> <p>21 me a reason, and they gave me a ride home in my</p> <p>22 car.</p> <p>23 Q. We'll discuss your termination more in</p> <p>24 detail. I want to talk more about your transfer. So</p> <p>25 you were transferred to another squad in November of</p>	<p>61</p> <p>1 Sergeant Alexander told me directly that</p> <p>2 Campbell came to him and said that, "We got to</p> <p>3 a transfer -- we got to separate Wayne, Deputy Wayne,</p> <p>4 and White. I don't know what's going on, but</p> <p>5 something going on."</p> <p>6 "They're not backing each other up on calls.</p> <p>7 They're not helping one another. They're not</p> <p>8 communicating, not talking to each other, et cetera.</p> <p>9 Have you heard anything about what's going on between</p> <p>10 them?"</p> <p>11 And Sergeant Alexander told me that he</p> <p>12 didn't know that Wayne and I evidently had a beef, or</p> <p>13 something was in the air. And he said that Campbell</p> <p>14 gave him an opportunity to accept my transfer or not</p> <p>15 He said, "I could have denied you the</p> <p>16 opportunity to come on -- come over here, but I</p> <p>17 didn't. I said, you know, 'White rode with me for a</p> <p>18 few days his first week, a few nights.' And he was</p> <p>19 like, 'And I had no problem with him, and plus I need</p> <p>20 certified officers.'"</p> <p>21 And so he was like, "The opportunity -- the</p> <p>22 door opened up," and he told me that he didn't have a</p> <p>23 problem with me. And you know, he heard that I worked</p> <p>24 when I was on D. Ray's shift. He said, "Based on</p> <p>25 everything that I heard from that side, that you're a</p>

<p>62</p> <p>1 good deputy. You know how to do your job." And he said, "Plus, with you being certified," he said, "I definitely need that."</p> <p>4 Now, Deputy Torrance Terrence, Terry --</p> <p>5 excuse me, I said that wrong. Deputy Terry,</p> <p>6 T-E-R-R-Y, Torrance provided me information</p> <p>7 face-to-face that Lieutenant Campbell called him in</p> <p>8 the office, wanting to know if he knew anything about</p> <p>9 Wayne and I not getting along, had he heard anything.</p> <p>10 And Terry, Deputy Torrance, told him no.</p> <p>11 And he asked Campbell what was going on, Lieutenant</p> <p>12 Campbell. And Campbell said, "Something's just going</p> <p>13 on. They are not acting as if they're working</p> <p>14 together. So you know, I said that they had to be</p> <p>15 separated. They had to be split up." And Torrance</p> <p>16 told me that Campbell told him to keep his eyes open.</p> <p>17 Q. Keep his eyes open for what?</p> <p>18 A. Torrance said that it was like, "When he</p> <p>19 told me that, 'keep my eyes open,' like be on the</p> <p>20 lookout or to watch out." And he was like, Torrance</p> <p>21 was like, "I'm not fitting to be no one's snitch." He</p> <p>22 was like, "White, I don't have no problems with you</p> <p>23 I don't have no problems with Wayne."</p> <p>24 He was like, "You just got over here. They</p> <p>25 said you work. Marin accepted you over here. Li</p>	<p>64</p> <p>1 White's transfer." And he said, "The Sheriff didn't</p> <p>2 approve it either because the Sheriff would have told</p> <p>3 me."</p> <p>4 And he said that, "I'm going to let" -- he</p> <p>5 said, "I'm going to talk to the Sheriff about this and</p> <p>6 I'm going to let Campbell and Watkins know not to m</p> <p>7 anymore shift transfer unless I give the go ahead or</p> <p>8 the Sheriff give the go ahead."</p> <p>9 Q. Okay ---</p> <p>10 A. And -- go ahead.</p> <p>11 Q. Let me -- just so we don't get too far in</p> <p>12 the weeds, who was the chief deputy that you're</p> <p>13 describing?</p> <p>14 A. The former Captain of Patrol, Lawrence D.</p> <p>15 Bullock.</p> <p>16 Q. Okay. And you were informed that the reason</p> <p>17 that you were transferred was because of your</p> <p>18 relationship or alleged problems with Wayne. Is that</p> <p>19 right?</p> <p>20 A. I was told by Sergeant Campbell that -- not</p> <p>21 Sergeant -- I was told by Sergeant Campbell that the</p> <p>22 purpose of my transfer was for people going through</p> <p>23 BLET, deputies.</p> <p>24 But I was later told by Sergeant Alexander,</p> <p>25 Sergeant Roberson and -- and Deputy Torrance that</p>
<p>63</p> <p>1 said, 'You don't have no -- you don't have no</p> <p>2 certified deputy, so you definitely need it.'" But</p> <p>3 all what Sergeant Alexander and Sergeant -- Sergeant</p> <p>4 Alexander and Deputy Terry told me, it was all put</p> <p>5 back on Campbell as him being the originator.</p> <p>6 Furthermore, to get specific into this</p> <p>7 question, Sergeant Roberson in late December of 2017</p> <p>8 filled in for Sergeant Alexander, and Sergeant</p> <p>9 Roberson and I had a conversation. I asked him, I</p> <p>10 said, "What is the issue with my transfer?" And he</p> <p>11 said, "Mr. White, I -- all I know is Campbell came</p> <p>12 me" -- excuse me, the Chief Deputy.</p> <p>13 "The Chief Deputy came to me and asked,</p> <p>14 'Where is Mr. White? Where is S33?'" And he said --</p> <p>15 he said, "I haven't heard him on the radio lately."</p> <p>16 And he said, "Well, he was transferred." "Transferred</p> <p>17 to where?" according to the Chief Deputy. "He was</p> <p>18 transferred to Marin's shift, Sergeant Alexander."</p> <p>19 And he said that the Chief Deputy said,</p> <p>20 "What?" He was like, "Who did that?" He said, "He</p> <p>21 came from Durwood, Lieutenant Campbell. And</p> <p>22 Watkins knows something about it too, Captain</p> <p>23 Watkins."</p> <p>24 And according to Sergeant Roberson, the</p> <p>25 Chief Deputy said, "Oh, no. I did not approve Mr</p>	<p>65</p> <p>1 Campbell was the one that was behind it. And because</p> <p>2 you stopped me from getting too further in the weeds,</p> <p>3 that I wasn't able to continue with what happened, the</p> <p>4 exchange between Sergeant Robinson and I.</p> <p>5 But that's essentially what I was told, that</p> <p>6 Campbell was the one that was behind it. And so the</p> <p>7 shift transfer was deceptive. It was based on</p> <p>8 falsiticity (sic).</p> <p>9 Q. Was race or gender or anything like that</p> <p>10 ever mentioned in these discussions?</p> <p>11 A. Counselor, the bottom line is, these</p> <p>12 complaints ---</p> <p>13 Q. It's a yes or no question.</p> <p>14 A. I'm sorry?</p> <p>15 Q. It's a yes or no question.</p> <p>16 A. Repeat the question, sir.</p> <p>17 Q. Was race, gender or sexual orientation</p> <p>18 mentioned in all of this regarding your transfer in</p> <p>19 any of it?</p> <p>20 A. No.</p> <p>21 Q. Okay. You can continue with what you were</p> <p>22 saying. Sorry.</p> <p>23 A. You may continue with your question.</p> <p>24 Q. Thank you. We will discuss more about the</p> <p>25 Wayne versus White relationship and I'll let you get</p>

<p>1 into that more. I assure you of that. So did you 2 have issues with Wayne? 3 A. No. I had no issues with Wayne. In fact, 4 that's why I found the shift transfer deceptive. And 5 furthermore, when him and I met together with 6 supervision, he admitted that he didn't have any 7 issues with me, and I also admitted. 8 In fact, Sergeant Roberson, upon me asking 9 if he had a problem with me, if he had any issues with 10 my personal conduct, if he had any issues with my 11 performance, he said no. He said, "You work." He 12 said, "You're a good -- good deputy." He said, "You 13 don't have any write-ups." 14 I asked Sergeant Marin Alexander the same 15 thing and he said no. He said, "We good." He said 16 "There was a -- a complaint by someone who worked 17 911, but according" -- this was information to me. 18 According to her supervisor, the assistant director 19 the time, he looked into it. He pulled the records 20 and said that he can't see what I did wrong and sent 21 letter over there. 22 And I was later told by Marin that I was 23 good to go. He was like, "You come to work. You 24 your job. We don't have a problem with you." And 25 I asked Captain Watkins, I said, "If they don't have</p>	<p>66 1 himself that he didn't approve it and he told Watkins 2 to put me back a few weeks ago, but that it had not 3 happened. And then afterwards, he said that he didn't 4 approve it and he told Watkins to put me back when I 5 was transferred again from Sergeant Marin's shift to 6 Sergeant Chris Welborn's shift. 7 So whatever took place, all those around, 8 the deception of the shift, other issues that Campbell 9 --- including what Campbell hyped up and made it seem 10 one way, and it was another way. 11 Q. So was -- when you say, "deception," was 12 Sheriff White involved in this deceptive transfer, as 13 you call it? 14 A. Not to my knowledge. He was not. But he's 15 ultimately responsible for what takes place at that 16 Sheriff's Office. 17 Q. Okay. Was Lawrence D. Bullock involved in 18 this? 19 A. Not to my knowledge. 20a Q. What about Weldon Wallace Bullock? 21 A. Not to my knowledge. 22 Q. Okay. And you mentioned a complaint by 911 23 that was investigated. Can you go into detail about 24 that? Who made the --- 25a A. I cannot. As far as the issue, evidently,</p>
<p>67 1 problem, including Wayne," I said, "Then who is the 2 problem?" 3 I said, "Who's the originator of this 4 stuff?" And Captain Watkins, he didn't say anything. 5 He was looking at all of us. And I said, "Well, it 6 had to get -- it had to come from somebody." And 7 turned over to Campbell. I said, "Well, didn't it 8 come from you?" 9 "Well, I was the one that saw what was going 10 on and I took it to Captain Watkins and said that 11 had to change, switch -- switch you all up." And I 12 said, "And you didn't think about coming to me before 13 all this stuff got to here so you could know that 14 there's nothing going on?" 15 "Well, you didn't need to know." He said, 16 "No. You didn't need to know." And so I contend 17 told him, I said, "I contend that I do need to know 18 because it's an alleged personnel issue of deputies 19 not getting along. And as it comes out, we don't have 20 a problem." 21 And so Captain Watkins said, "Well, in all 22 probability, that you will probably be going back 23 D. Ray's shift." He said, "I might will talk to the 24 Sheriff myself," and that was that. 25 But prior to that, the Sheriff told me</p>	<p>68 1 according to Sergeant Alexander -- and he would be the 2 one that you need to talk to and pull the files if 3 necessary. A 911 dispatcher complained about me 4 handling a call or something, and he said that they 5 were going to pull the -- the tapes. 6 I The Assistant Director was going to pull the 7 tape and he was going to review it and let us know 8 what he found. And he did so later on that week and 9 sent a letter -- excuse me? I thought I heard 10 something. 11 He sent a letter -- it could have been some 12 noise. He sent a letter saying that he was unable to 13 see what I did wrong, and I was told by Sergeant 14 Alexander that I was cleared. I was in -- I was good 15 to go. 16 I Q. Do you know who the 911 dispatcher was? 17 A. I believe he said that it was someone by the 18 name of Veronica, but I may be wrong. But I believe 19 that's what he said, who he said complained. 20 Q. Do you know of a Makin (ph) that may be a 21 911 dispatcher? 22 A. Yes. 23 Q. Who was that? 24 A. She was -- I believe she was working that 25 night as well, so she may have been -- she may have</p>

<p>70</p> <p>1 complained as well. Or it was something -- I believe</p> <p>2 Veronica may have been the -- the shift supervisor and</p> <p>3 Makin was the dispatcher. But somebody from there</p> <p>4 complained, but I was cleared.</p> <p>5 Q. Do you know if Makin -- do you know what</p> <p>6 Makin's relationship was to Deputy Wayne?</p> <p>7 A. Well, they -- well, allegedly, they had a</p> <p>8 romantic relationship.</p> <p>9 Q. To your knowledge, did that relationship</p> <p>10 have anything to do with the complaint against you?</p> <p>11 A. For -- from 911?</p> <p>12 Q. Yes.</p> <p>13 A. To my knowledge, no.</p> <p>14 Q. Okay. All right. So ---</p> <p>15 MS. ROBINSON: Brian, can we take a</p> <p>16 bathroom break right quickly?</p> <p>17 MR. CASTRO: Yes. I was going to</p> <p>18 suggest that. Thank you.</p> <p>19 MS. ROBINSON: Okay. Thank you.</p> <p>20 THE COURT REPORTER: We are off the</p> <p>21 record. The time is 12:06.</p> <p>22 (Brief recess: 12:06 p.m. to 12:12 p.m.)</p> <p>23 THE COURT REPORTER: We are back on the</p> <p>24 record. The time is 12:12 p.m.</p> <p>25 MR. CASTRO: All right. Can you hear</p>	<p>72</p> <p>said that it was related to a 911 call and Veronica</p> <p>and Makin. And I don't think that is what he</p> <p>testified to.</p> <p>4 MR. CASTRO: Okay.</p> <p>5 Q. (Mr. Castro) Prior to your transfer, you</p> <p>6 mentioned that there was a complaint by a 911</p> <p>7 dispatcher. Is that correct?</p> <p>8 A. Yes. There was a complaint -- no. The --</p> <p>9 the complaint with the 911 dispatch happened after I</p> <p>10 was transferred on Sergeant Alexander's shift.</p> <p>11 Q. So before you were transferred in November</p> <p>12 of 2017, did you spend time with Wayne outside of</p> <p>13 normal work hours?</p> <p>14 A. There were times where him and I would talk</p> <p>15 on the phone or -- in terms of, like -- when you say,</p> <p>16 "hang out," what are you -- what are you asking?</p> <p>17 Q. I'm asking whether you ever spent time or</p> <p>18 were physically present at his home or he was</p> <p>19 physically present at your home outside of normal work</p> <p>20 hours?</p> <p>21 A. He had came by a few times. Very, very</p> <p>22 limited.</p> <p>23 Q. Have you ever visited him?</p> <p>24 A. I had went over there a few times. Very</p> <p>25 limited.</p>
<p>71</p> <p>1 all right?</p> <p>2 THE WITNESS: Yes, can you?</p> <p>3 MR. CASTRO: Okay.</p> <p>4 Q. (Mr. Castro) We're going to explore this</p> <p>5 transfer in more detail. So you mentioned that Makin</p> <p>6 (phonetic) and possibly another person was at 911</p> <p>7 dispatch when the complaint was made. Is that right?</p> <p>8 A. Yes.</p> <p>9 Q. Do you ---</p> <p>10 MS. ROBINSON: Objection. Let me</p> <p>11 understand this. The transfer had nothing to do with</p> <p>12 the 911 call. I don't think that has been what was</p> <p>13 said as of yet or any testimony in evidence. I think</p> <p>14 what he said --</p> <p>15 MR. CASTRO: Wait ---</p> <p>16 MS. ROBINSON: --- about the ---</p> <p>17 MR. CASTRO: You can't make a speaking</p> <p>18 objection or testify. So if you object, you object.</p> <p>19 All right.</p> <p>20 MS. ROBINSON: It's misquoting the</p> <p>21 witness.</p> <p>22 MR. CASTRO: I'm not misquoting him.</p> <p>23 I'm asking him about the transfer, and I'm asking</p> <p>24 about the 911 call.</p> <p>25 MS. ROBINSON: No, no. But you also</p>	<p>73</p> <p>1 Q. Could you give an estimate of how many</p> <p>2 times?</p> <p>3 A. Maybe less than a handful, approximately.</p> <p>4 Q. Was there ever a time where you answered</p> <p>5 Deputy Wayne's personal cell phone for him?</p> <p>6 A. Not that I remember.</p> <p>7 Q. Do you ever remember answering his phone or</p> <p>8 a phone when Makin was calling him?</p> <p>9 A. No.</p> <p>10 Q. Do you remember having any conversations</p> <p>11 with Makin Persall (ph) or Pearsall?</p> <p>12 A. She had came -- there was one day him and I</p> <p>13 were working -- or well, actually, a few days him and</p> <p>14 I were working and we had stopped at -- it was this --</p> <p>15 it was this ice cream place in Henderson. It was near</p> <p>16 like Parham Road or something, P-A-R-H-A-M.</p> <p>17 And a few times -- well, nearly just about</p> <p>18 every time. But I remembered directly a few times, w</p> <p>19 will get there and she will pop up. Or sometimes whe</p> <p>20 we would get there and when I'm getting out of the ca</p> <p>21 and he getting out of his, it was like he had somebody</p> <p>22 coming.</p> <p>23 It would be about five minutes. Sometimes</p> <p>24 we will wait, sometimes we will place our order if the</p> <p>25 line was already long, and each time it was her.</p>

<p style="text-align: right;">74</p> <p>1 Q. Did you two get along? Did you get into any 2 disputes?</p> <p>3 A. No. We had never had any disputes. I never 4 had any problems with her.</p> <p>5 Q. Do you remember ever talking to her or 6 joking with her about your relationship with Mr. 7 Wayne?</p> <p>8 A. No. Him and I were co-workers. There was 9 professional relationship.</p> <p>10 Q. Do you remember ever making sexual jokes to 11 Makin at any time?</p> <p>12 A. No. Absolutely not.</p> <p>13 Q. Just for the record, I'm not implying 14 anything about any conversations. I'm just asking 15 based on my review of records. So after you were 16 transferred, did you and Wayne get into any disputes 17 or arguments?</p> <p>18 A. No. There were no disputes or arguments. 19 Not to my knowledge.</p> <p>20 MR. CASTRO: Okay. Can we go off the 21 record?</p> <p>22 THE COURT REPORTER: We're off the 23 record. The time is 12:17 p.m. 24 (Lunch recess: 12:17 p.m. to 1:21 p.m.) 25 THE COURT REPORTER: We are back on</p>	<p style="text-align: right;">76</p> <p>1 minor issue when I was on his shift, Sergeant Marin 2 Alexander's shift, involving Deputy Torrance in terms 3 of hospital relief. And -- but other than that minor 4 issue, there was no big issues to where we couldn't 5 work together.</p> <p>6 Q. Could you describe in detail what happened 7 regarding hospital relief?</p> <p>8 A. There was a situation. It was -- I haven't 9 touched to the effects of it and it's been a long time 10 ago. There was a situation involving when we were 11 being rotated in and out of the hospital. 12 Times were getting distorted. People 13 sitting longer than what they should have been, people 14 out longer on the road than what they should have 15 been -- pursuant to the normal relief, an hour and 16 then sometimes two hours.</p> <p>17 So there was an issue with the hospital 18 relief and Sergeant Alexander didn't know all the 19 facts, and he later admitted his -- he showed remorse 20 forward and -- and Torrance also was -- you know, 21 showed remorse. But at the same time, it was a minor 22 issue and we were able to move forward.</p> <p>23 There was no disciplinary action. There was 24 no back and forth. It was just something that came up 25 and not something that I initiated, something that</p>
<p style="text-align: right;">75</p> <p>1 record. The time is 1:21 p.m.</p> <p>2 Q. (Mr. Castro) All right. Mr. White, a few 3 more questions about the 2017 transfer. Is it correct 4 that you were transferred to Sergeant Alexander's 5 squad?</p> <p>6 A. Yes.</p> <p>7 Q. What was his reaction to you joining his 8 squad?</p> <p>9 A. He seemed to welcome me, but he also told me 10 why -- the real reasons why I had been transferred.</p> <p>11 Q. When you say he welcomed it, how did he do 12 that?</p> <p>13 A. He said that he was glad to have me. He 14 wanted somebody else certified because he didn't have 15 anybody.</p> <p>16 Q. Had you worked well together in the past?</p> <p>17 A. I only had worked with him for -- when I 18 first started riding with him. So we had never had 19 any issues, yes. Based on the limited time we were 20 together.</p> <p>21 Q. Did you work well with the other members of 22 your new squad under Sergeant Alexander?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have any personal issues with them?</p> <p>25 A. There was an issue. There was a minor, very</p>	<p style="text-align: right;">77</p> <p>1 Deputy Torrance Terry initiated to Sergeant Alexander 2 on me.</p> <p>3 Q. How did he initiate that, do you know?</p> <p>4 A. He called him and talked to him.</p> <p>5 Q. And did you all just talk it out after that, 6 or how was that ---</p> <p>7 A. I believe we talked individually and then we 8 talked briefly, collectively, real brief. But like I 9 said, it's been a long time ago.</p> <p>10 Q. Okay. So did you lose any of your 11 responsibilities when you transferred to Sergeant 12 Alexander's shift? Did they change?</p> <p>13 A. No, it stayed the same. I didn't lose 14 anything.</p> <p>15 Q. Did your duties change?</p> <p>16 A. My duties as a law enforcement officer 17 changed -- did not change, excuse me, based on a 18 transfer. Did not change.</p> <p>19 Q. Did it have any effect on your pay or 20 benefits?</p> <p>21 A. No.</p> <p>22 Q. Did you consider it to be a demotion?</p> <p>23 A. No.</p> <p>24 Q. Did you consider it to be a downgrade in any 25 way?</p>

<p>1 A. No.</p> <p>2 Q. Okay. So moving on to another topic, were</p> <p>3 you aware that Sheriff White was previously an NC</p> <p>4 Highway Patrol officer?</p> <p>5 A. I was aware that he was a major, retired</p> <p>6 major. Former state trooper, retired state trooper.</p> <p>7 Q. Were you aware of how long he was a state</p> <p>8 trooper for?</p> <p>9 A. I believe somewhere between 20 to 25 years,</p> <p>10 if not longer.</p> <p>11 Q. Do you agree that based on those 25 years,</p> <p>12 he would be familiar with traffic enforcement?</p> <p>13 A. Yes. He would be very familiar with it.</p> <p>14 Q. Do you agree that the Sheriff has the</p> <p>15 authority to make decisions on what his deputies will</p> <p>16 focus on during their shifts?</p> <p>17 A. Now, he has the power to make whatever</p> <p>18 decisions for that matter, but he also -- I mean,</p> <p>19 there's laws out there that tell us -- provide us what</p> <p>20 to do as well. So it's just not discretionary</p> <p>21 authority.</p> <p>22 Q. And when you say there's laws out there,</p> <p>23 what are you referring to exactly?</p> <p>24 A. Enforcement of traffic laws that appears to</p> <p>25 be the issue or something -- well, one of the issues</p>	<p>78</p> <p>1 from when you first see a violation to the point where</p> <p>2 you serve them with, let's say a summons?</p> <p>3 A. I'm not sure what you're asking, because I</p> <p>4 didn't have a ticket book.</p> <p>5 Q. Yes, exactly. So without having a ticket</p> <p>6 book, how do you cite them or how do you enforce those</p> <p>7 laws?</p> <p>8 A. Okay. So as the Sheriff instructed me in</p> <p>9 December of 2017, to do criminal summons.</p> <p>10 Q. How does that process work?</p> <p>11 A. I would draft the criminal summons. It</p> <p>12 would be -- a temp number would be issued to me. I</p> <p>13 would then take it -- take the criminal summons to the</p> <p>14 Magistrate's Office.</p> <p>15 The Magistrate would then type in the temp</p> <p>16 number, pull it up, review what's on the criminal</p> <p>17 summons, will spare -- swear me in. Get my brief</p> <p>18 testimony and determine the merits of whether or not</p> <p>19 there's probable cause.</p> <p>20 Q. And then how do you serve the summons?</p> <p>21 A. I serve it on the person and I return it</p> <p>22 back to the clerk.</p> <p>23 Q. So do you -- you issue the summons after the</p> <p>24 stop is completed, after you've already let them go?</p> <p>25 A. Yes. But I also told them that they can</p>
<p>79</p> <p>1 in which I was told to do traffic.</p> <p>2 Q. So do those traffic laws change the</p> <p>3 Sheriff's authority when it comes to telling you what</p> <p>4 to do?</p> <p>5 A. No. I'm not saying that it changed his</p> <p>6 authority. I'm just saying that there are statutory</p> <p>7 obligations as law enforcement officers at that time</p> <p>8 that we're required to do.</p> <p>9 Q. Do those statutory obligations, can they go</p> <p>10 against what the Sheriff tells you to do? Can they</p> <p>11 allow you to disobey the Sheriff?</p> <p>12 A. Well, I'm not sure if there's any provision</p> <p>13 in that statute that specifies that.</p> <p>14 Q. So if the Sheriff said, for example, "Don't</p> <p>15 enforce traffic laws," but there are statutory</p> <p>16 obligations to do so, would it be appropriate to</p> <p>17 enforce traffic laws?</p> <p>18 A. If he says not to do it, then we're going to</p> <p>19 be expected not to do it.</p> <p>20 Q. Okay. Did you focus on the issue which you</p> <p>21 pointed out, which is traffic enforcement at previous</p> <p>22 jobs?</p> <p>23 A. No.</p> <p>24 Q. So can you walk me through the process of</p> <p>25 how you cite someone without having a ticket book,</p>	<p>80</p> <p>1 expect to receive some paperwork on it.</p> <p>2 Q. Did you ever tell them, "You're free to go,"</p> <p>3 and not inform them that you were going to give them a</p> <p>4 summons, but then serve a summons? Did that ---</p> <p>5 A. I believe I've told every last one of them</p> <p>6 that I served those summons on to expect some</p> <p>7 paperwork. Every ---</p> <p>8 Q. Did citizens ever complain -- keep going.</p> <p>9 A. I'm sorry. Go ahead, sir.</p> <p>10 Q. Did citizens ever complain about this</p> <p>11 practice?</p> <p>12 A. I am not aware of citizens outside of Ms.</p> <p>13 Jamie Goss complaining, but I told her on the side of</p> <p>14 the road that she can expect to have some paperwork</p> <p>15 for it because she could have killed somebody.</p> <p>16 Q. Okay. Before we talk more about Jamie, did</p> <p>17 Sheriff White ever reprimand you for issuing summonses</p> <p>18 after seeing a traffic violation?</p> <p>19 A. I -- I do not recall him reprimanding me for</p> <p>20 a -- for such. You're talking about issuing a</p> <p>21 criminal summons after a traffic violation?</p> <p>22 Q. Or a traffic violation, yes.</p> <p>23 A. Not to my knowledge, unless you have a</p> <p>24 specific case that may trigger my memory.</p> <p>25 Q. Did he ever just say, "Can you stop issuing</p>

<p>82</p> <p>1 traffic citations,” or “Can you stop issuing these 2 summonses for traffic citations?” 3 A. Did who say that? 4 Q. Sheriff White. 5 A. No. He told me to issue them. 6 Q. Did other supervisors such as Lieutenant 7 Campbell tell you this? 8 A. When you say “this,” referring to? 9 Q. Tell you to stop issuing summonses after 10 traffic violations? 11 A. That's what Lieutenant Campbell wrote in the 12 write-up. So to answer your question, yes. Based 13 what he wrote in the write-up. 14 Q. Did he tell you that directly, orally? 15 A. When he was on the phone with me, cursing 16 me out, fussing me out as well, I didn't realize there 17 was a third party in the room. He said, "Man, you got 18 to stop issuing these" -- I believe he said, “traffic 19 summons” or “criminal summons,” something. 20 It -- he said, “Because you're getting 21 complaints,” and et cetera. And at that time, I was 22 not aware of a complaint until at that -- when he told 23 me. 24 Q. How did you respond when he told you to stop 25 doing this? </p>	<p>84</p> <p>1 incident with you? 2 A. For that situation, he said that he approved 3 Campbell's written warning for me, but he never spoke 4 to me about it. 5 Q. When did he say he approved the written 6 warning? 7 A. Well, it was in April -- April 2018 when him 8 and I talked. And he said that he was the one, that I 9 couldn't appeal it to him -- excuse me, or I couldn't 10 appeal it because he's the one that approves it. 11 Although Campbell wrote it up, he said that 12 as Sheriff, he approved it. And I remember the Chief 13 Deputy saying something about when they suspended 14 that the Sheriff -- that he agrees with it and the 15 Sheriff signed off on it. 16 Q. Okay. So you mentioned that you believe 17 Jamie Goss could have killed people. Can you walk me 18 through how that went, what you saw and how you went 19 about stopping her? 20 A. Yes. I will have to be brief with it and 21 refer you to the operation report or the incident 22 report that I did on it. But to be brief, because 23 it's been -- it's been a while, I observed her in the 24 northern part of the county while I was on patrol. 25 She violated several traffic laws and she </p>
<p>83</p> <p>1 A. I asked him what was going on. I inquired 2 about it because I had no knowledge on what he was 3 referring to. 4 Q. Was that after the Jamie Goss incident, to 5 your knowledge? 6 A. Yes. 7 Q. Was that the first time he told you 8 something of that matter about the traffic citations 9 and summonses? 10 A. Are you asking me if there was a matter 11 before Jamie Goss where he told me not to do them? 12 Q. Yes. Did he ever tell you not to do --- 13 A. Not to my knowledge. 14 Q. Was the Jamie Goss incident the first time? 15 A. Yes. As I've said, Sheriff White told me to 16 do the criminal summons then because I didn't have a 17 ticket book, despite him claiming he'd gave me one. 18 And so she almost killed some -- somebody, some 19 people, so I had to enforce the laws. 20 Had I had not did what I was supposed to do, 21 it was a -- it -- she could have came up there and 22 complained, not -- not came down there and complained. 23 Somebody could have came up there and complained 24 me being behind her and not doing anything about it. 25 Q. Did Sheriff White address the Jamie Goss </p>	<p>85</p> <p>1 put people's lives as well as her life in danger by 2 crossing some yellow lines multiple times. She didn't 3 have a seat belt on. There was something else. Maybe 4 driving left to center. Like she -- she almost caused 5 if not a few, at least one head-on collisions. 6 And I pulled her over, and she said that she 7 was sorry. And I told her, I said, “You know, sorry 8 is not going to cut it for the family when you kill 9 somebody.” And I told her that she can expect to 10 receive some paper, and I believe a call had came out 11 for me. 12 It was only Sergeant Alexander and I on duty 13 that day as far as the squad. From what I remember, 14 it was just him and I. And I had to go to another 15 part of the county and handle that call, but I will 16 refer you back to the operations report or the 17 incident report that I did on it. 18 Q. Okay. Do you remember if you went to serve 19 the summons the next day? 20 A. Maybe the next day, if not the next couple 21 of days. 22 Q. Why did you serve it so quickly, or why did 23 you not serve it within two days? 24 A. Well, when I applied for PC and it was 25 granted, I didn't have a call to handle at that time. </p>

<p style="text-align: right;">86</p> <p>1 It was a slow day. I believe it was a Saturday I 2 served her. So I -- so I served it to her -- served 3 it on her, excuse me. 4 Q. So when you stopped Jamie Goss, could you 5 have called Sergeant Alexander to bring his citation 6 book? 7 A. Well, I could have -- I could have called 8 him, but surely, I mean -- and that didn't come to my 9 mind. But surely, he most likely wouldn't have came 10 up there for that, because he was handling the 11 southern part of the county and I was handling the 12 northern part of the county. 13 Q. So after the Jamie Goss incident, did you 14 continue to conduct traffic stops? 15 A. When -- yes. Whenever the situation 16 required a vehicle to be stopped, if it was a major 17 issue, a major concern, I would stop them. 18 Q. What do you define as a major issue or a 19 major concern? 20 A. Surely, I wouldn't -- surely, I'm not going 21 to stop somebody to make a big deal out of them 22 failing to signal or something like that. But if you 23 are driving left to center, almost crash into 24 somebody's car. 25 If you're, you know, speeding to the point</p>	<p style="text-align: right;">88</p> <p>1 Paragraph 78, which appears on Page 16 of 47. 2 A. Which number? 3 Q. Paragraph 78. So it says on Paragraph 78 -- 4 if I'm reading this incorrectly, please let me know. 5 I might be looking at the wrong excerpt. 6 A. All right. 7 Q. Well, okay. Sorry, 82. So it says, 8 "Lieutenant Campbell called Mr. White and verbally 9 assaulted him." Can you describe what this verbal 10 assault was? 11 A. Of him fussing and later cursing at me about 12 Jamie Goss, a white woman who I issued traffic summons 13 to for violating the laws of the State. 14 Q. Did he mention her race during the call? 15 A. No. He didn't mention her race, but her 16 race was known that she was white, to me. 17 Q. Did he mentioned your race or anyone's race? 18 A. No, he didn't. 19 Q. Did he mention gender or sexual orientation 20 or anything of that matter? 21 A. No. 22 Q. Did he use any racial slurs or offensive 23 language of that matter? 24 A. He didn't use any racial slurs, but he said 25 the words "ass" multiple times, and "damn."</p>
<p style="text-align: right;">87</p> <p>1 of where you're putting your life and other lives in 2 danger. It has to be something -- like if you're -- 3 if I suspect you of -- you know, if there's some type 4 of like, if you're impaired by an impaired substance 5 and you're all over the road, those are major issues 6 where we need to protect public safety. 7 Q. When it comes to minor issues, would you 8 consider having your headlights off in nighttime minor 9 or major? 10 A. That's a major issue. In fact, I talked to 11 the Sheriff about that when I talked to him in April, 12 and he seemed to agree. He asked me what I was going 13 to do when I got her pulled over, and I told her -- 14 said, "Tell -- tell her to turn her headlights on 15 because she's driving with no lights on at pitch black 16 dark at night, and she didn't have no headlights on." 17 I said, "She's going to kill somebody or 18 injure somebody," something to the effect, I said. 19 And he said, "That's right." Or he said, "Okay." 20 that is a major issue, Counselor. 21 (DEPOSITION EXHIBIT 22 NUMBER 3 WAS MARKED 23 FOR IDENTIFICATION) 24 Q. (Mr. Castro) So if we can look at Exhibit 25 3, which is the amended complaint, and turn to</p>	<p style="text-align: right;">89</p> <p>1 Q. Did he use anything --- 2 A. And he said he was going to handle my ass at 3 12 o'clock, whenever he came in. Said, "I'll deal 4 with your ass then." 5 Q. Did he use any language that's offensive to 6 a particular sexual orientation? 7 A. No. 8 (DEPOSITION EXHIBIT 9 NUMBER 9 WAS MARKED 10 FOR IDENTIFICATION) 11 Q. Okay. If we can turn to the Exhibit 9, 12 which is the official written reprimand regarding the 13 Jamie Goss incident. Can you please take some time to 14 review that? 15 (Witness examines document) 16 A. Somebody scroll down. Scroll down. Scroll 17 down. All right. 18 Q. Do you recognize this document? 19 A. Scroll down. Yes. That document was 20 provided to me for the first time after he wrote me 21 up, he being Lieutenant Campbell. 22 Q. And is that your signature on the fourth 23 page? 24 A. Yes, that is my signature. 25 Q. Did you sign this on February 20th, 2018?</p>

<p>90</p> <p>1 A. Yes, that was the date.</p> <p>2 Q. Did you read it before you signed it?</p> <p>3 A. It was read aloud to me and I read it. I</p> <p>4 told him I did not agree with it and the Chief Deputy</p> <p>5 told me to sign it.</p> <p>6 Q. Okay. I want to give you the opportunity to</p> <p>7 respond to some of the statements in this document.</p> <p>8 So on Page 1 ---</p> <p>9 A. Let's scroll back up.</p> <p>10 Q. In about the middle of that paragraph, it</p> <p>11 says, "I informed him that he had no business going</p> <p>12 back serving criminal summons for traffic violations</p> <p>13 on people because he was not issued a citation book.</p> <p>14 He jumped back at me telling me I was being</p> <p>15 disrespectful to him and not going to talk to him that</p> <p>16 way."</p> <p>17 Question: did he inform you of that</p> <p>18 statement right there?</p> <p>19 A. Like I said, it's been a while ago. There</p> <p>20 are a lot of things in here that he claimed happened</p> <p>21 did not happen. A lot of it's distorted. He may have</p> <p>22 said it. He may not have said it.</p> <p>23 Q. Did he tell you to stop serving criminal</p> <p>24 summons for traffic violations, to your knowledge?</p> <p>25 A. He -- like I said, he put it in the</p>	<p>92</p> <p>1 up for you. I'm going to bat for you, speaking up for</p> <p>2 you and having your back."</p> <p>3 I said, "The only one." I said, "The rest</p> <p>4 of these people," I'm referring to the deputies and</p> <p>5 the supervisors, "Talk negative of you, talk bad of</p> <p>6 you." And I said, "I -- now I know." I said, I -- I</p> <p>7 know I said, "I see why they call you Dirty Soup," and</p> <p>8 that's how that conversation went.</p> <p>9 I never walked towards him, as he falsely</p> <p>10 put in his statement later on, a few months</p> <p>11 afterwards. And I never walked towards him or moved</p> <p>12 towards him, as Marin falsely -- Sergeant Alexander</p> <p>13 falsely put in his statement.</p> <p>14 I simply shut up. I mean -- well, you know,</p> <p>15 I silenced myself and I left. I didn't do no stomping</p> <p>16 out, didn't slam no doors. I simply left.</p> <p>17 Q. What does that term, "Dirty Soup," mean?</p> <p>18 What is that about?</p> <p>19 A. Sergeant Marin Alexander and Sergeant Dona</p> <p>20 Roberson both told me that Campbell, Lieutenant</p> <p>21 Campbell, is Dirty Soup, said his Soup is dirty. They</p> <p>22 said, "Lieutenant Campbell," his last name. "Campb</p> <p>23 Soup, Campbell Soup." And they said that Campbell</p> <p>24 dirty. His personality is dirty. So they put the</p> <p>25 terms together, Dirty Soup.</p>
<p>91</p> <p>1 write-up, as my previous answer. He put it in the</p> <p>2 write-up, as I previously said ---</p> <p>3 Q. Do you remember ---</p> <p>4 A. --- and he said, "Man, you got to stop</p> <p>5 serving these traffic summons or criminal summons"</p> <p>6 Q. And on Page 2, on the last paragraph.</p> <p>7 Towards the end of that paragraph, it says, "Then he</p> <p>8 said he only had one father and he was a large Black</p> <p>9 man and even he didn't tell him what to do anymore."</p> <p>10 Do you remember saying anything like that?</p> <p>11 A. My words are distorted, but it was something</p> <p>12 said loosely to that effect.</p> <p>13 Q. What would be a more accurate way to</p> <p>14 describe what you said?</p> <p>15 A. I told him that my father was a big Black</p> <p>16 man and that "he did not talk to me the way that you</p> <p>17 did." And I was referring to the fussing, the yelling</p> <p>18 and the cursing that Campbell did to me over the</p> <p>19 phone.</p> <p>20 And the fussing and the yelling, and maybe</p> <p>21 few curse words. Not as many as was when he was</p> <p>22 the phone and Poole was listening into the</p> <p>23 conversation. And I told him, I said, "He didn't do</p> <p>24 it." And I said nobody else was going to do it. And</p> <p>25 I specifically said, "I'm the one around here taking</p>	<p>93</p> <p>1 Now, to go a little bit specific in your --</p> <p>2 your question. Sergeant Marin Alexander and Deputy</p> <p>3 Torrance Terry and I were at the Waffle House off of</p> <p>4 Tiny Broadwick and Dr. Martin Luther King, those</p> <p>5 roads, not too far from I-85 by Maria Parham hospita</p> <p>6 in I believe December and -- December 2017.</p> <p>7 And Marin, Sergeant Alexander, said that he</p> <p>8 did not like Campbell. He said that Campbell was</p> <p>9 dirty, that he was sneaky, that that man just do</p> <p>10 things ass backwards. And I asked him, I said, "Well</p> <p>11 what did you mean he's dirty and sneaky?"</p> <p>12 He said, "Man, my old girl and I got into it</p> <p>13 and Campbell came out there with some other deputy</p> <p>14 And I said, "What do you mean, got into it?" And he</p> <p>15 said, "We just got into it." And he said, "Campbell</p> <p>16 came out there with some deputies and he said, 'We</p> <p>17 don't care if he's a deputy. Tell us what he did.</p> <p>18 We'll lock him up.'"</p> <p>19 I said, "Lock you up for what?" I said,</p> <p>20 "What happened?" He said, "Well, my girl called</p> <p>21 on me and we had an issue." And I asked you -- I</p> <p>22 asked him. I said, "Well, when you say 'issue,' are</p> <p>23 you talking about domestic?" And he shook his head</p> <p>24 with an up and down motion, signaling what I thought</p> <p>25 was yes.</p>

<p>94</p> <p>1 And I asked him. I said, "Well, did -- did 2 you hit her?" He was like, my mom and dad taught 3 not to ever let anybody put their hands on me. And 4 she put her hands on me and we had an issue." And he 5 was -- he was, you know, shaking his head up and 6 still. 7 And he said Campbell threatened to lock him 8 up and whatnot despite them working together. And 9 he said, "Ever since this man tried to have me 10 arrested and had tried to locked me up for domestic 11 And he said, "The only reason my girl didn't say 12 anything because I had her scared, I had her shook 13 She wasn't going to say anything against me." 14 And so he said they ended up going their 15 separate way for awhile. But he said, "Now you see 16 why we say 'Dirty Soup.'" 17 Q. Got you. I got the innuendo now. 18 A. I'm sorry? 19 Q. I said I get the connection with his name 20 now. 21 A. Okay. 22 Q. Can we go to the next page? And on the 23 final paragraph, it says, "I had deputy White the 24 first two weeks of field training. It was clearly 25 explained to him in field training that traffic</p>	<p>96</p> <p>1 Q. If you go to the final page, the first 2 paragraph, it says, "This practice of stopping cars 3 and then going back issuing summons is in violation of 4 previous orders given to him to cease traffic 5 enforcement." 6 Were previous orders given to you to cease 7 traffic enforcement? 8 A. In fact, no. What I can say specifically, 9 Sergeant Roberson told me -- and it's, you know, in a 10 statement he had wrote later on that I didn't have a 11 copy on. But he told me that there was some talk 12 around the office about me stopping cars. 13 And he told me, he said, "You're not the 14 only one. It's a whole -- it's others that are 15 stopping cars too." In fact, there was another deputy 16 that -- that was doing criminal summons like I was 17 doing, if not more. And I know this from Sergeant 18 Roberson and Chief Bullock. 19 But he told me just to watch my back, and he 20 said that the Sheriff didn't like -- well, the Sheriff 21 wasn't too big on us, you know, being in the city or 22 whatnot, stopping cars, unless it was like a major or 23 serious violation or where we had to take action right 24 then to, you know, protect somebody or save someone 25 life.</p>
<p>95</p> <p>1 enforcement was not a top priority as he seemed to 2 want to 'go get' every minor traffic violation we 3 observed." 4 Did Campbell clearly explain to you during 5 field training that traffic enforcement was not a top 6 priority? 7 A. No. He did not clearly explain that. In 8 fact, he's -- there's a specific word I was looking 9 for. I can't think of the word I'm looking for. But 10 one, he's been hypocritical, if anything, but there's 11 another word. 12 But I'll explain it. I don't know what he 13 means by "clearly explain," because him and I were 14 pulling over traffic together. I mean, I was with him 15 and he had already mentioned to himself that he was a 16 traffic guru. 17 And so there were a lot of traffic that him 18 and I did together. Some of it was calling it in by 19 him. A few times, less than a handful of times, he 20 let me radio in just to show me the -- you know, to 21 get the hang of it. 22 And then he praised me on how clear I talked 23 on the radio. And then other times he didn't call it 24 in, so that's -- that whole statement, that's done. 25 That part of it.</p>	<p>97</p> <p>1 Now, when he talked to me about it, what I 2 did was -- you know, it was like I see and don't see. 3 Because I -- I mean, I don't want my name to be in 4 people mouths and whatnot all the time. And so there 5 were times where the situation was major and he told 6 me, he said, "Yes. You can pull them over for major 7 or serious issues." 8 In fact, in one of his statements, he said, 9 you know, after I talked to him, his stuff -- his 10 traffic enforcement ceased dramatically. So the -- 11 the thing of telling me to not to do any more traffic 12 enforcement, that is just not true. It's false. 13 MR. CASTRO: Can we go off the record? 14 Is now a good time for a five-minute break? 15 MR. MCGURL: That's fine by --- 16 THE WITNESS: Hold on one second, sir. 17 (Witness points camera to Mr. McGurl) 18 MR. MCGURL: Yes. That would be fine 19 by us. Five minutes is fine. 20 MR. CASTRO: Okay. We can get back at 21 2:10 p.m., if that's okay. 22 MR. MCGURL: Thank you. 23 THE COURT REPORTER: We are off the 24 record at 2:04 p.m. 25 (Brief recess: 2:04 p.m. to 2:10 p.m.)</p>

<p>1 THE COURT REPORTER: Okay. We are 2 on the record. It is 2:10 p.m. 3 (DEPOSITION EXHIBIT 4 NUMBER 10 WAS MARKED 5 FOR IDENTIFICATION) 6 Q. (Mr. Castro) Mr. White, we are going to 7 move to Exhibit 10, what has been previously marked 8 Exhibit 10. Can you please review this exhibit, which 9 consists of two pages. 10 (Witness examines document) 11 A. Scroll down. All right. If you would 12 scroll back up. All right. 13 Q. Have you seen this document before? 14 A. I was never issued that document. It wasn't 15 until after I was terminated from the Vance County 16 Sheriff's Office on false allegations of excessive 17 force that -- after violating my rights under federal 18 law, that I saw this document, which was submitted 19 Vance County Department of Human Resources. 20 Q. How do you know who submitted this document? 21 A. That document was never in my personnel file 22 with Argretta Johen when I reviewed it, in which 23 personnel file that she had and to her own admission 24 was very thin. 25 Also, that document was not in my personnel</p>	<p>98 backtherein? 100 2 A. No. I didn't specifically ask to see the 3 disciplinary documentation, but I asked to see my 4 entire personnel file. And my written warning, the 5 suspension, was in there along with personnel -- the 6 performance evaluation. 7 But this is something that I need to bring 8 up. The date up here is January 27th, 2017. I didn't 9 start working until June 5th, 2018 (sic). So this 10 employee counseling record, this counseling form, 11 precedes the dates of my employee -- employment. 12 Q. So when did you start working at the Vance 13 County Sheriff's Office? 14 A. June 5th, 2017. 15 Q. If we can go to the second page. It says, 16 "In checking further, it was found that there are 7 17 other instances since Dec. 15, 2017 in which Deputy 18 White has made arrests for traffic violations on 19 either summons or warrants after conducting traffic 20 stops." 21 Does that number sound accurate to you? 22 A. I have not seen the official reports of it. 23 Most certainly, I will say that it may be correct. 24 However, I haven't received -- seen the specific 25 documentation that he reviewed, but I was definitely</p>
<p>99 1 file, after I begged to review my personnel file at 2 the -- in September. I believe it was the first two 3 weeks of September of 2018, one month before I was 4 terminated. That document was not in there. 5 In fact, I asked to make a copy of my file. 6 It was approximately somewhere between -- no more than 7 50 pages, which was mostly of my F3, my application, 8 my suspension, corrective action and miscellaneous 9 files, not dealing with disciplinary. Those were my 10 performance evaluations. But most certainly, that 11 document was never in there. 12 Q. When you say there were 50 pages when you 13 reviewed it, around what time did you review the 14 personnel file? 15 A. As I stated, the -- somewhere around the 16 first two weeks of September of 2018, I reviewed my 17 personnel file at the Sheriff's Office and Janie 18 Martin's office, Sheriff White's former Executive 19 Assistant or Secretary. 20 Q. Did you ask specifically to see counseling 21 records or disciplinary actions? 22 A. See, here's the thing -- okay, ask that one 23 more question. Ask that question again one more 24 Q. When you asked to review your personnel 25 file, did you ask to see the disciplinary documents</p>	<p>101 1 doing my job. 2 (DEPOSITION EXHIBIT 3 NUMBER 11 WAS MARKED 4 FOR IDENTIFICATION) 5 Q. (Mr. Castro) Okay. If we can move on to 6 Exhibit 11. Can you please review this document? 7 MS. ROBINSON: If we can for just 8 record-keeping purposes, can you state -- ask him to 9 state what the document is? 10 MR. CASTRO: Yes. 11 Q. (Mr. Castro) What is this document? 12 A. It appears to be a statement from Deputy 13 Brian K. Wayne, dated January 30th, 2018. 14 Q. Have you ever seen this document? 15 A. The first time that I seen this document -- 16 yes. The first time that I'd seen this document was 17 in September of 2018, a month before I was terminated 18 when I requested to review my personnel file. It was 19 not in Argretta's file, but it was in the Sheriff's 20 Office file and --- 21 Q. Does -- continue. 22 A. --- and also this document -- there was two 23 documents that Chief L.D. Bullock had during my 24 suspension, and I asked for copies of it. And those 25 two documents, based on the look of the document</p>

<p>102</p> <p>1 that -- the two documents he had when he denied me,</p> <p>2 saying I have everything I need, he would not give me</p> <p>3 a copy of it. And I later found these in my personnel</p> <p>4 file.</p> <p>5 Q. Do you know if Argretta, is that who you</p> <p>6 said? And the Sheriff's Office have separate</p> <p>7 personnel files for you?</p> <p>8 A. They do have separate personnel files.</p> <p>9 Everything that was in Argretta's file was from the</p> <p>10 county orientation, okay? Which was very, very,</p> <p>11 extremely thin.</p> <p>12 Q. Okay. So going back to Exhibit 11, it says</p> <p>13 on the first sentence, "As it pertains to Deputy J.J.</p> <p>14 White's vehicle stops, I as one of his Field Training</p> <p>15 Officer advised him to only make them if absolutely</p> <p>16 necessary. I used the specific circumstance of an</p> <p>17 egregious traffic violation (i.e. failure to stop at a</p> <p>18 red light or stop sign) if it happens while in his</p> <p>19 presence."</p> <p>20 Did he advise you during training to only</p> <p>21 make traffic stops when absolutely necessary?</p> <p>22 A. No. That was not his advice. In fact, he</p> <p>23 told them to make them whenever I could. And when</p> <p>24 and I were in field training, we'd stopped so many</p> <p>25 cars in the City of Henderson and in Vance County</p>	<p>104</p> <p>4, Sheriff amongst some other things. But the specific</p> <p>5 words, I can't recall them verbatim.</p> <p>6 Q. Let's turn to Exhibit 12.</p> <p>7 (DEPOSITION EXHIBIT</p> <p>8 NUMBER 12 WAS MARKED</p> <p>9 FOR IDENTIFICATION)</p> <p>10 A. But I will know, sir, that Deputy Brian</p> <p>11 Kenneth Wayne admitted in front of Deputy Andre Poole</p> <p>12 that he lied on me and that he was sorry for doing so.</p> <p>13 And that the Chief Deputy, Lawrence Bullock, and a</p> <p>14 lieutenant told him to do it, and he said he didn't</p> <p>15 know what to do because he has a child.</p> <p>16 Q. Lied about what? What was he referring to?</p> <p>17 A. The statement that he wrote and the things</p> <p>18 that he said to -- to upper management.</p> <p>19 Q. And how did you find out about this?</p> <p>20 A. Because Wayne told me in front of Poole,</p> <p>21 Deputy Andre Poole.</p> <p>22 Q. All right. Turning to Exhibit 12. I'll</p> <p>23 give you some time to review this.</p> <p>24 (Witness examines document)</p> <p>25 A. Can you make it a little bit bigger? Thank</p> <p>you. Go down. Yeah. Thank you. This is the</p> <p>statement that Sergeant Roberson, dated February --</p> <p>excuse me. February 1st, 2018, wrote in reference to</p>
<p>103</p> <p>1 Q. It then says, "While in Field Training,</p> <p>2 Deputy White asked if we could 'do some traffic' as we</p> <p>3 were not very busy." Did you ask this?</p> <p>4 A. No. Wayne -- Deputy Wayne made it a</p> <p>5 priority to do traffic, and he made it very clear</p> <p>6 that's what he likes to do since -- since he came from</p> <p>7 the highway patrol.</p> <p>8 In fact, he said while I'm with him, "When</p> <p>9 we're not busy, when we come across something good,</p> <p>10 we're going to do traffic." So it wasn't no "some</p> <p>11 traffic." He made it very clear that traffic was a</p> <p>12 part of what he was wanting to do in his job as a</p> <p>13 deputy sheriff.</p> <p>14 Q. Do you know if Deputy Wayne had a citation</p> <p>15 book?</p> <p>16 A. I believe he did.</p> <p>17 Q. It goes on to say in the middle of that</p> <p>18 paragraph, "I then pointed out that he had not been</p> <p>19 issued a citation book so there was not much he could</p> <p>20 do in the event that he did have a reason to perform a</p> <p>21 vehicle stop." Do you remember him pointing that out</p> <p>22 to you?</p> <p>23 A. I have no -- recollection of him saying</p> <p>24 those specific words. I do remember him saying since</p> <p>25 I'm certified, I should get a traffic book from the</p>	<p>105</p> <p>1 what's in his file.</p> <p>2 Q. Okay. Let me know when you are finished</p> <p>3 reviewing it.</p> <p>4 A. Okay. (Witness examines document). Okay.</p> <p>5 Q. All right. If you look towards the middle</p> <p>6 of the paragraph, closer to the first half, it says --</p> <p>7 it has a typo, but it says, "I also spoke with Deputy</p> <p>8 White and advised him that he needed to ease up on the</p> <p>9 traffic stops unless it was a major violation that had</p> <p>10 to be stopped so that the general public did not have</p> <p>11 a bad view of the Vance County Sheriff's Office."</p> <p>12 Do you remember this conversation?</p> <p>13 A. I remember him saying something to the</p> <p>14 effect of. He didn't say, "a major violation." He</p> <p>15 told me to protect somebody's life. Now, in terms of</p> <p>16 a bad view of the Vance County Sheriff's Office, that</p> <p>17 part I do not recall. And like I said, it's been a</p> <p>18 long time ago.</p> <p>19 Q. Got you. If we move on to the second half,</p> <p>20 there is that sentence that says, "I then spoke with</p> <p>21 Deputy White and advised him that he needed to stop</p> <p>22 the excessive traffic stops and even explained to him</p> <p>23 that the majority of his stops were in the city."</p> <p>24 "I also explained to Deputy White that we</p> <p>25 have enough crime in the County that we have no reason</p>

<p style="text-align: right;">106</p> <p>1 to be running around -- no reason to be running around 2 in the city looking for vehicles to stop." 3 Do you remember this conversation? 4 A. It was the same -- on the same time that 5 what you just -- what we just went over previously. 6 Something to the effect of that. But I will say, he 7 did say that a lot of my stops were in the city based 8 on what he could see, and he told me to ease up on 9 traffic stops. 10 And I also explained to him that there had 11 been another deputy or other deputies that were using 12 my traffic stop number that he issued me. Because I'd 13 seen the traffic stop forms on his desk and it had my 14 number, my traffic stop number, but that was not my 15 handwriting, my signature. 16 And so he said he was going to look into it. 17 And when I talked to him later, he said that he did 18 address it. That deputy was using my traffic stop 19 number because he didn't have a traffic stop number 20 assigned to him, and that he submitted a request, 21 Sergeant Roberson submitted a request, to get that 22 deputy a traffic stop number. 23 Q. Who was that deputy? 24 A. I believe it was Deputy Zachary (phonetic) 25 alone. But it's been a long time ago, so it could've</p>	<p style="text-align: right;">108</p> <p>1 please. And if you could zoom a little bit. 2 (Witness complies) 3 A. This is a statement from Sergeant Marin 4 Alexander, dated July 18th, 2018. (Witness examines 5 document) Okay. Thank you. 6 Q. Do you remember the argument that this is 7 referring to? 8 A. This argument is in reference to the 9 exchange -- verbal exchange between -- allegedly 10 between Campbell and I, but this argument -- this 11 statement is deceptive. 12 Q. In what way? 13 A. One, I was not in my patrol car when 14 my Lieutenant Campbell called me. I was in the patrol 15 room along with Deputy Andre Poole. Also, I did not 16 walk towards Lieutenant Campbell. I did not step 17 towards him. I did not do anything to make it seem 18 like I was going to physically assault him. 19 That's not what I did. I said what was 20 consistent earlier and I ended up leaving. At no 21 point in time did I threaten or make movements to do 22 Campbell or anybody else bodily harm. 23 Q. Did you approach him? 24 A. No. 25 Q. Even slowly?</p>
<p style="text-align: right;">107</p> <p>1 been somebody else, but it definitely -- what I just 2 testified to is true and factual. 3 Q. What time period was this, where someone 4 might have been using your name? 5 A. It wasn't somebody -- they were using it. 6 Not might, they were. And it was when I was on 7 Sergeant Roberson's shift towards the fall of 2017. 8 So let's see. Somewhere between September and 9 November, right before I was transferred. 10 Q. Who has knowledge of this? 11 A. The person that did it. The -- Sergeant 12 Roberson and I. And I'm not sure if Sergeant Roberson 13 spoke to his management about it, but I definitely 14 brought it to him. 15 Q. Okay. Towards the end of this statement, it 16 says, "Deputy White agreed to comply and from that 17 point on the traffic stops that were called by -- in 18 by Deputy White on the radio decreased dramatically 19 Is that true? 20 A. Yes. 21 (DEPOSITION EXHIBIT 22 NUMBER 13 WAS MARKED 23 FOR IDENTIFICATION) 24 Q. Okay. Moving on to the next exhibit, 25 Exhibit 13. I would like you to review Exhibit 13,</p>	<p style="text-align: right;">109</p> <p>1 A. I never approached him. He was on the other 2 side of the patrol room, near the entrance to the 3 hallway that leads to the desk -- desk secretary as 4 well as the -- some of the offices for criminal 5 investigations. I was on the other side of the patrol 6 room that leads to the hallway where 911 dispatch is. 7 Q. Okay. So let's talk about --- 8 A. This whole statement, that "I better leave 9 this office before I will -- before I do something I 10 will regret later on," no. Marin -- Sergeant 11 Alexander's statement is full of lies, falsiticity 12 (phonetic). 13 Q. When it says, "Let me tell you something, 14 you will not continue to talk to me the way you have 15 over the phone nor in person." Deputy White also 16 stated, "That's disrespectful and I am not your child 17 neither are you my Father." Is that accurate? 18 A. My words are twisted and distorted. No, 19 it's not accurate. 20 Q. Do you remember what you said? 21 A. Like I said, it's been a long time ago. 22 However, when he said, "Let me tell you something, y 23 will not continue to talk to me the way you have over 24 the phone nor in person." When he came in, I said to 25 Lieutenant Campbell something to the effect that, "Y</p>

<p>110</p> <p>1 talked to me very rude and nasty over the phone and I</p> <p>2 didn't appreciate it."</p> <p>3 And this part about, "That's disrespectful,</p> <p>4 I am not your child neither are you my father." I</p> <p>5 said that my father is a big, Black man and he don't</p> <p>6 talk to me like that.</p> <p>7 Q. Okay. Do you recall the part where ---</p> <p>8 A. If they wanted a statement written -- if</p> <p>9 they wanted a statement written, they should have</p> <p>10 wrote it when the situation happened before I got</p> <p>11 suspended, versus six, if not seven months later on</p> <p>12 I'm sorry, Counselor, go ahead.</p> <p>13 Q. No worries. It says that, "Deputy White</p> <p>14 also stated 'You called me on the phone earlier while</p> <p>15 I was in my patrol car and started talking about the</p> <p>16 way I serve my criminal summons, you was very nasty</p> <p>17 me and I thought I was doing my job correctly.'" "</p> <p>18 Did Campbell call you about the way you were</p> <p>19 serving criminal summons?</p> <p>20 A. As I answered that question earlier,</p> <p>21 Campbell did call in reference to the criminal</p> <p>22 summons, saying, "Man, you got to stop serving the</p> <p>23 traffic or criminal summons," something to that effect</p> <p>24 that he said. All right? But I was never in my</p> <p>25 patrol car. I was in the patrol room with a</p>	<p>112</p> <p>1 that he is in the office and I went back.</p> <p>2 I told her, I said, "Stay right here,"</p> <p>3 because I didn't know who she was, and I definitely</p> <p>4 wasn't going to bring somebody in that office not</p> <p>5 knowing who she was or if she was cleared to go back.</p> <p>6 So I went to the -- back to the office and I told</p> <p>7 Sergeant Alexander, "You have a visitor. There was a</p> <p>8 female out here asking if you're here."</p> <p>9 And so he went out there, and he was like,</p> <p>10 "Nobody should be coming up here for me at work."</p> <p>11 I said, "Well, she's right here." He went out there.</p> <p>12 And so he got closer, he was like -- he recognized</p> <p>13 her, he knew who she is.</p> <p>14 And I went to my car. And after that, my</p> <p>15 phone rang and Deputy Poole advised me that Sergeant</p> <p>16 Alexander said to him in front of Campbell, "Damn,</p> <p>17 White was talking to a lieutenant like that." And --</p> <p>18 and he said that Marin was trying to make it seem like</p> <p>19 I was in the wrong.</p> <p>20 And Poole told me that he said to Marin, he</p> <p>21 was like, "Don't play that man like that. What</p> <p>22 Campbell did to him over the phone when you weren't</p> <p>23 there was nasty and disrespectful and White spoke his</p> <p>24 piece." So that's pretty much about it.</p> <p>25 Q. We can take this exhibit off the screen. Do</p>
<p>111</p> <p>1 third-party deputy, Deputy Andre Poole.</p> <p>2 Q. And Lieutenant Campbell, it says in this</p> <p>3 statement, replied by saying, "Yes I did and you need</p> <p>4 to stop serving the criminal summons as we have</p> <p>5 directed." Do you remember him saying that?</p> <p>6 A. No. He didn't say that. In fact, his words</p> <p>7 are distorted. Once more, he -- this Lieutenant</p> <p>8 Campbell was very unprofessional and provocative in</p> <p>9 terms of throwing around the word, "ass" and "damn,"</p> <p>10 okay? Despite threatening me. Now, this statement</p> <p>11 just is full of falsification.</p> <p>12 Q. Did you leave the room through the hallway</p> <p>13 that you described, where the 911 communications</p> <p>14 office is located?</p> <p>15 A. Yes. That's the hallway I left out of.</p> <p>16 Q. What happened after this discussion occurred</p> <p>17 between you and Lieutenant Campbell?</p> <p>18 A. I left the office and went to my patrol</p> <p>19 room -- not patrol room, but my patrol car. No. I</p> <p>20 me take that back. Let me take that back. Let me</p> <p>21 take that back.</p> <p>22 I left the patrol room and I was headed to</p> <p>23 my patrol car, and there was a young woman that</p> <p>24 standing on the outside of the locked door, and she</p> <p>25 asked if Sergeant Alexander was available. And I</p>	<p>113</p> <p>1 you remember being suspended for five days around</p> <p>2 February of 2018?</p> <p>3 A. Yes.</p> <p>4 Q. Can you explain why you got suspended or the</p> <p>5 reasons given to you?</p> <p>6 A. The ones on the write-up that were false.</p> <p>7 It says, "Officer Complaint." I want to know who was</p> <p>8 the officer that was complaining. Maybe they meant</p> <p>9 Citizens' Complaint. Insubordination, everything that</p> <p>10 was listed in the reference -- the subject line.</p> <p>11 Q. What was the incident that -- what was the</p> <p>12 insubordination that they were referring to, do you</p> <p>13 think?</p> <p>14 A. They most likely were referring to</p> <p>15 Campbell's situation and when I allegedly, according</p> <p>16 to Campbell, was disrespecting Marin, talking about</p> <p>17 "man-to-man." But, see, here's the thing. Marin and</p> <p>18 I weren't going at it. It was Poole and Marin who</p> <p>19 were having a verbal exchange.</p> <p>20 This goes back to you all, your client, not</p> <p>21 following the facts. Marin and Poole were having a</p> <p>22 disagreement about the things that were going on</p> <p>23 as shift, Marin not working, not pulling his fair end,</p> <p>24 not responding to calls, especially 10-18 emergency</p> <p>25 traffic. 10-18 is the 10 code for emergency traffic.</p>

<p>114</p> <p>1 The emergency traffic is lights and sirens.</p> <p>2 They were talking about a lot of things just</p> <p>3 not going right on the shift, why Marin couldn't</p> <p>4 answer the radio or answer his phone and was</p> <p>5 constantly saying that his public service, which</p> <p>6 refers to his telephone, is down. And I was trying to</p> <p>7 mediate it because Sergeant Alexander began to --</p> <p>8 not going to say that he broke down crying, but he</p> <p>9 began to -- I will say, show signs of sincerity.</p> <p>10 There's a specific word for it. Basically, emotional</p> <p>11 He began to be emotional and he</p> <p>12 spontaneously utter that the Captain is calling him</p> <p>13 saying that the Sheriff called him, Captain Watkins</p> <p>14 was called by Sheriff White, saying that Marin was</p> <p>15 bad super -- supervisor, and that he was responsible</p> <p>16 for what was going wrong with the shift and that the</p> <p>17 were going to be some immediate changes.</p> <p>18 Before it, Marin was saying, "Captain called</p> <p>19 me, Captain called me, Captain called me." So Poole</p> <p>20 asked him, "Well, which captain?" And he asked</p> <p>21 again and Marin wouldn't answer him. So I said,</p> <p>22 "Marin." I said, "Sergeant Alexander," I said, "The</p> <p>23 man is asking you a question." I said, "At least you</p> <p>24 can answer his question. After all, you're the one</p> <p>25 that's volunteering the information to us." I said,</p>	<p>116</p> <p>1 more, there was emergency traffic in the County and</p> <p>2 Sergeant Alexander was closer to the call by at least</p> <p>3 ten miles closer, ten to 12 miles closer.</p> <p>4 And Poole was at the southern line that</p> <p>5 bordered Vance and Franklin counties. And we know</p> <p>6 that he was closer because two state troopers provided</p> <p>7 verbal testimony that they were sitting there with</p> <p>8 Marin at the intersection of Warrenton Road and</p> <p>9 another road.</p> <p>10 And when the tones -- the emergency tones</p> <p>11 dropped, when it went off the radio waves, Marin drove</p> <p>12 off with his lights and sirens like he was going to do</p> <p>13 something, and instead, he didn't. And so as a</p> <p>14 result, after we handled the call up north, when we</p> <p>15 was down south, Poole got on the radio and said</p> <p>16 whatever he said and they end up having an exchange</p> <p>17 over the radio.</p> <p>18 And then either Poole called Marin</p> <p>19 Alexander, Sergeant Alexander, or Sergeant Alexander</p> <p>20 called Poole. But Sergeant Alexander threatened</p> <p>21 Poole's life, said, "You want to put your life on it?"</p> <p>22 And so not long after that, Poole was suspended.</p> <p>23 Q. Do you know who those two state troopers</p> <p>24 were that you said gave verbal confirmation?</p> <p>25 A. I believe it was -- I don't know their first</p>
<p>115</p> <p>1 "The captain called you." I said, "We're</p> <p>2 subordinates. You shouldn't be even telling us about</p> <p>3 this."</p> <p>4 And he was like, "But I really care and I</p> <p>5 get fired. I break down when" -- when -- "I shut</p> <p>6 down," excuse me. He said, "I shut down when people</p> <p>7 start coming at me, 'boom, boom, boom'." And I said,</p> <p>8 "Which captain?" And he was like, "Watkins."</p> <p>9 And at that point in time, we heard the door</p> <p>10 slam and we later found out in less than maybe 30</p> <p>11 seconds that it was Campbell that was coming in</p> <p>12 through the side door. So there was never a dispute</p> <p>13 between Sergeant Alexander and I. There was a</p> <p>14 dispute, a factual dispute, okay, in terms of a verbal</p> <p>15 exchange between Poole and Sergeant Alexander.</p> <p>16 Q. Was Deputy Poole also suspended?</p> <p>17 A. Yes. He was suspended for, I believe,</p> <p>18 unbecoming conduct. Something to that effect.</p> <p>19 Q. So moving on to another subject ---</p> <p>20 A. But his situation was not with my situation.</p> <p>21 It was involving him and Marin having a verbal dispute</p> <p>22 over 911 radio waves, which is public document.</p> <p>23 Q. And did you try to mediate that dispute?</p> <p>24 A. There was nothing for me to mediate because</p> <p>25 somebody went and put paperwork on it. Then on</p>	<p>117</p> <p>1 names. I believe it may have been Trooper Thomas and</p> <p>2 Trooper Burrell, but it was definitely a trooper</p> <p>3 stationed in Vance County. But I believe it was</p> <p>4 Trooper Thomas, Trooper Burrell.</p> <p>5 Q. Do you remember a March 27, 2018 incident</p> <p>6 involving a collision with a vehicle?</p> <p>7 A. I remember a -- I remember a minor fender</p> <p>8 bender, yes.</p> <p>9 Q. Can you tell me what happened?</p> <p>10 A. As I previously stated about the headlights</p> <p>11 when you questioned that earlier, that was involving</p> <p>12 her and I and the incident has been a long time ago,</p> <p>13 at least three years ago. And I did do a report on</p> <p>14 it. I noticed the car driving, no headlights, and I</p> <p>15 was going to turn around and go get the car and I</p> <p>16 backed up and I hit her car.</p> <p>17 Q. Do you remember what time it was, around</p> <p>18 what time?</p> <p>19 A. Maybe around -- somewhere around 8:30, nine</p> <p>20 o'clock maybe. It was at night.</p> <p>21 Q. So did you turn on your lights before you</p> <p>22 tried to turn around?</p> <p>23 A. Well, that's what I was doing. However, the</p> <p>24 camera -- the camera shows, according to Sergeant</p> <p>25 Welborn, when he looked at the camera, that the cam</p>

<p>118</p> <p>1 showed me turning the lights on either as I hit a car 2 or after I hit -- after I hit her car. But according 3 to the young woman's statement, I turned my lights 4 before I hit her car and then backed into her. 5 So whichever one it is, I definitely turned 6 my lights on. And if the camera is showing that, then 7 there is a possibility, because it's video evidence 8 that it's electronic, that there's a delay. And it's 9 not uncommon for videos of surveillance to have a 10 three to five second, if not longer, delay. 11 Q. But do you remember at what point you turned 12 on your lights? 13 A. I thought that I had turned them on when 14 when I was backing up, trying to get turned around 15 Q. So how did you react when you saw the car 16 without your headlights on? What did you do with 17 regard to the --- 18 A. As I said to Sheriff White, what I was going 19 to do when I saw it was turn around, get her stopped 20 or get him stopped, whomever the motorist was, and 21 tell them to turn their lights on. 22 Q. Did you slam on your brakes when you saw the 23 car without the lights on? 24 A. I began to slow down. 25 Q. How quickly did you slow down?</p>	<p>120</p> <p>1 was not the case. But I take responsibility for that 2 because it -- it was a wreck. Luckily, there was no 3 significant injuries. 4 Q. When you say you take responsibility, what 5 do you mean? 6 A. It happened. 7 Q. Was it your fault --- 8 A. I can't deny it. 9 Q. Did you cause it to happen? 10 A. Well, I didn't intentionally cause it to 11 happen. However, it happened. 12 (DEPOSITION EXHIBIT 13 NUMBER 14 WAS MARKED 14 FOR IDENTIFICATION) 15 Q. All right. If we can pull up Exhibit 14. 16 And I will ask you to review this and let us know what 17 it is. 18 (Witness examines document) 19 Q. You may need to zoom slightly. 20 A. You ready? 21 Q. Yes. What is this document? 22 A. This is the document from Sergeant Chris 23 Mark Welborn dated 4-3-18 in reference to the vehicle 24 collision that you just questioned me on, excuse me. 25 Q. And it says here, "Deputy White stated he</p>
<p>119</p> <p>1 A. Well, I don't have a calculation for that, 2 sir. 3 Q. Okay. After you put the car in reverse, how 4 quickly did you start backing up the car? 5 A. When you say, "quickly," define --- 6 Q. How long did it take for you to start 7 backing up the car? Sorry. 8 A. Well, it definitely didn't take minute after 9 minute. Maybe a handful of, you know, seconds to 10 turned around once I came to a complete stop. 11 Q. Did you check for traffic behind you before 12 you backed up? 13 A. Yes. I looked and I thought that she was -- 14 the driver was, you know, going to slow down to let 15 get turned around. But unfortunately, things did not 16 go as I wanted them or as they should have went. 17 Q. Why didn't you wait for the car to pass? 18 A. The car was behind me. 19 Q. You left your lane. Why didn't you wait for 20 the car that was behind you to get out of your way? 21 A. It was a one-lane road. The car was behind 22 me. In other words, you go in one lane, you come 23 and you -- you come in in another lane. So when I 24 backing up and the car, what I thought was going 25 stationary for me to go ahead, but unfortunately,</p>	<p>121</p> <p>1 had his emergency lights on when he turned around in 2 the roadway." Is that what you told Sergeant Welborn? 3 A. Yes. Something to that effect. 4 Q. Was that what actually happened? 5 A. As I just told you, my -- I'm standing by my 6 story that I just provided you. I believe that I had 7 turned on my lights, my emergency equipment to get 8 that -- turn around and get that car pulled over 9 before the wreck happened. 10 Q. So you believe that happened? 11 A. Yes. I thought that that's what I was 12 doing, turning my lights on, and wanted -- wanted to 13 get this person stopped to tell them to turn their 14 lights on. Unfortunately, a wreck took place. 15 Q. And it says on the final two sentences, 16 "Deputy White has been told on several occasions not 17 to be stopping vehicles. I recommend a ten day 18 suspension for Deputy White." 19 A. Well, first -- go ahead. I'm sorry. 20 Q. Were you told on several occasions not to be 21 stopping vehicles? 22 A. No. I'm -- the statement is distorted, all 23 as right? First and foremost, "on several occasions" and 24 be "not to be stopping vehicles" is what I was told. 25 That shouldn't even have been put in there by him</p>

<p>122</p> <p>1 because while I was on his shift, him and I were 2 stopping cars together when we had our own cars. 3 He would back me up on his -- on my traffic 4 stops, and I would back him up on his. In fact, I 5 backed up some of the -- uncertified deputies on his 6 shift. I backed them up on their multiple traffic 7 stops. 8 And I just want to add for this, "I 9 recommend a ten day suspension for Deputy White, 10 since you said the last two sentences. This statement 11 that he presented me to sign is not the same statement 12 as this. 13 He had no recommendation for a ten-day 14 suspension for me. In fact, in one of the video 15 recordings of him, Goolsby and I, that same recording 16 with Sergeant Welborn -- excuse me, Sergeant 17 Alexander. 18 He was asked by I believe Lieutenant 19 Goolsby, "Do you believe that White should have got 20 suspended for that?" And Sergeant Welborn can 21 heard saying no, or disagreeing with a suspension. 22 So this whole statement, "I recommend a ten 23 day suspension" for me, "for Deputy White," that part 24 was never in this form. Once more, this is another 25 manipulation of evidence by your client.</p>	<p>124</p> <p>1 the write-up, it was not accurate --- 2 Q. So you refused --- 3 A. --- but I signed it because I was told to 4 sign it. 5 Q. So your refusal to sign is based on the fact 6 that they made a big deal in the past about 7 signatures? 8 A. Yes. That's... 9 MR. CASTRO: Okay. We can take a break 10 now. And you're on mute, Ms. Robinson. 11 THE COURT REPORTER: We are off the 12 record. It is 2:58 p.m. 13 MR. CASTRO: You're still on mute, Ms. 14 Robinson. 15 MS. ROBINSON: Yes. I was saying I 16 kind of object to the last characterization of his 17 testimony. I think he's testified that he objected -- 18 or he refused to sign because the statement wasn't 19 true and he was directed to sign the first statement. 20 MR. CASTRO: Noted. All right. We'll 21 go off the record. 22 THE COURT REPORTER: We are now off the 23 record. The time is 2:58. 24 (Brief recess: 2:58 to 3:17 p.m.) 25 THE COURT REPORTER: We are back on the</p>
<p>123</p> <p>1 MS. ROBINSON: Mr. Castro. Can we take 2 a break when you get finished with this? 3 MR. CASTRO: Yes. Just a few more 4 questions on this. 5 Q. (Mr. Castro) Does it -- it says you refused 6 to sign. Is that correct? 7 A. I'm sorry? 8 Q. It says that you refused to sign this 9 document at the bottom, to the left. Is that correct, 10 did you refuse to sign this? 11 A. Yes. I refused to sign. 12 Q. Why did you refuse to sign it? 13 A. I was not going to put my signature on 14 anything else after they made a scene. Management 15 made a scene because I signed the written warning. 16 wasn't going to put my signature on no employee 17 counseling or coaching, let alone -- written warning. 18 Because upper management made a big deal 19 because I signed the corrective action that Campbell 20 issued to me that was allegedly approved by the 21 Sheriff. So my signature did not go on any additional 22 documentation. 23 Q. Regardless of whether those documents were 24 accurate, you just didn't want to sign anything? 25 A. The documents weren't accurate. In terms</p>	<p>125</p> <p>1 record. The time is 3:17 p.m. 2 (DEPOSITION EXHIBIT 3 NUMBER 16 WAS MARKED 4 FOR IDENTIFICATION) 5 Q. (Mr. Castro) All right. So I would like to 6 turn your attention, Mr. White, to Exhibit 16. And I 7 would like you to review it and let us know what this 8 is? 9 (Witness complies) 10 A. That is a DMV-349, traffic or -- excuse me, 11 my wreck report. 12 Q. Does this appear to be a report from the 13 collision that we were discussing before the break? 14 A. Yes, it appears to be. 15 Q. If you look at Page 2, there's an 16 illustration. Does that illustration appear to be 17 correct? 18 A. It's similar to what happened. 19 Q. Are there any inaccuracies that you can note 20 about the illustration? 21 A. I mean, it's a illustration. So I mean, 22 it's -- it's similar. 23 Q. We're going to move on to Exhibit 17, which 24 will be shared to your screen. This is a placeholder 25 because the document was too large to send via e-mail.</p>

<p>1 (DEPOSITION EXHIBIT 2 NUMBER 17 WAS MARKED 3 FOR IDENTIFICATION) 4 MR. CASTRO: So I'll ask the court 5 reporter to share the video. 6 MS. ROBINSON: Mr. Castro, I'm sorry. 7 What video is this of? 8 MR. CASTRO: This is a video of the 9 March, 2018 incident involving Mr. White's vehicle. 10 MS. ROBINSON: You all haven't produced 11 any videos at all. 12 MR. CASTRO: We have identified them in 13 our -- this video particularly in our initial 14 disclosures, but there were no discovery requests 15 related to this video. If we received such a request, 16 we of course can produce it. 17 MS. ROBINSON: There were discovery 18 requests related to anything that was affiliated with 19 Mr. White and his employment. 20 MR. CASTRO: Again, these were in the 21 initial disclosures. They were disclosed to you 22 awhile back. 23 MS. ROBINSON: We haven't received this 24 video and I want to -- I'm objected to viewing it. 25 MR. CASTRO: Your objection is noted.</p>	<p>126 1 that time, it was pitch-black night, so... 2 MR. CASTRO: Okay. You can play the 3 video, ma'am. 4 (Video plays) 5 MR. CASTRO: You can pause the video. 6 Q. (Mr. Castro) Does this appear to be the 7 collision that we were discussing involving you? 8 A. Yes. 9 Q. Do your lights appear to be on before you 10 attempt to stop and turn? 11 A. No, they do not. 12 Q. When does it appear from the video that your 13 lights turned on? 14 A. It appears from the video afterwards. 15 Q. About how long afterward? 16 A. I didn't count the number of seconds, but 17 shortly afterwards. 18 Q. You mentioned that there might have been 19 lag. Do you think this delay could be based on lag in 20 the video? 21 A. I said that there may have been some type of 22 delay because it's not uncommon for there to be a 23 delay when it comes to surveillance. And for that 24 matter, video surveillance, electronic surveillance or 25 even broadcasting.</p>
<p>127 1 Can you please play the video, Ms. Court Reporter? 2 And if you can skip to the 30th second of the video. 3 Can you pause the video? Mr. White, what is the 4 timestamp on the top of this video? 5 A. 3-17-2018, 9:40. 6 Q. Did the collision that we discussed happen 7 on 3-17-2018? 8 A. No. It didn't happen on -- not that I know. 9 I don't remember it happening on 3-17-2018. It may 10 have been 3-27-2018, but it was something, somewhere 11 around March. But as you just said, not 3-17-2018. 12 I don't remember it happening on that date, but I know 13 it was somewhere in March. I'm not disputing it 14 happening. 15 Q. Can you reread the timestamp, please? 16 A. 3-27-2018 9:40:52 seconds. 17 Q. So it's not 3-17. It's 3-27. Did the event 18 happen on March 27, 2018, to the best of your 19 knowledge? 20 A. I have no reason to say otherwise. 21 Q. To the best of your knowledge, did this 22 event happen at 9:00 -- around 9:40 p.m.? 23 A. I have no other -- I have no reason to say 24 otherwise. I mean, I -- I've told you somewhere 25 around about 8:30, 9 o'clock approximately. So around</p>	<p>128 1 Q. Do you think --- 2 A. And I also said -- I'm sorry, sir? 3 Q. Continue. 4 A. Go ahead. 5 Q. Do you think the delay is the reason that it 6 appears your lights turn on after you attempt to turn? 7 A. What I'm saying it, stating a -- a fact that 8 this could have been the issue. But I'm not disputing 9 the situation happening, and as I've already said, 10 I'd take responsibility for it. 11 Q. Are you disputing that you did not turn on 12 your blue lights until you hit the other car? 13 A. I'm not disputing what took place in terms 14 of the -- the wreck, the entire wreck. What I'm -- 15 what I'm saying is I take responsibility for it. It 16 happened --- 17 Q. Do you admit -- do you admit that you did 18 not turn on your lights until after you hit the other 19 car? 20 MS. ROBINSON: I object. This is the 21 third time he's answered that question. 22 MR. CASTRO: No. He hasn't answered 23 this question. 24 Q. (Mr. Castro) Can you answer the question, 25 Justin White?</p>

<p>130</p> <p>1 A. Based on the video, it appears that I did</p> <p>2 not turn on my lights on after the wreck.</p> <p>3 Q. Why did you tell your superiors that you had</p> <p>4 turned on your lights prior to the wreck?</p> <p>5 A. Because I felt that I had turned on my</p> <p>6 lights prior to the wreck. Not only that, based on</p> <p>7 her statement. She said in her writing that I turned</p> <p>8 on my lights and backed up into her.</p> <p>9 Q. What belief -- you said, based on your</p> <p>10 belief that you had turned on your lights. What was</p> <p>11 that belief ---</p> <p>12 A. I thought that when I -- I thought I had</p> <p>13 turned on my lights. I mean, I asked that -- answered</p> <p>14 that question multiple times. I thought I turned on</p> <p>15 my lights. The video says otherwise.</p> <p>16 Q. So when the statement said that you informed</p> <p>17 your superior that you did turn on the lights, but a</p> <p>18 video indicated otherwise, is that an accurate</p> <p>19 statement?</p> <p>20 A. Repeat the question.</p> <p>21 Q. Is it accurate that you told your superiors</p> <p>22 that you had turned on your lights before the</p> <p>23 collision, when in fact, you had not?</p> <p>24 A. Are you asking me if -- is it true that I</p> <p>25 told my superiors that I turned them on and they</p>	<p>132</p> <p>1 are so many B&Es and burglaries and other calls of</p> <p>2 services I responded to, so I can't pinpoint that one.</p> <p>3 If you have some type of evidence, video, recording,</p> <p>4 radio traffic, please share with me. It might trigger</p> <p>5 something to where I do remember it.</p> <p>6 Q. Okay. We're going to move on to the Ms.</p> <p>7 Latwayna Oliver incident, spelled L-A-T-W-A-Y-N-A,</p> <p>8 Oliver, which happened in October of 2018. What can</p> <p>9 you tell me about Ms. Oliver?</p> <p>10 A. What is it that you want to know about Ms.</p> <p>11 Oliver? That's a very broad statement.</p> <p>12 Q. Did you know anything about her before</p> <p>13 October of 2018?</p> <p>14 A. I did not know her.</p> <p>15 Q. Did you know her personally?</p> <p>16 A. No.</p> <p>17 Q. I want to talk about your first encounter</p> <p>18 with Ms. Oliver. What was the first encounter that</p> <p>19 you had with Ms. Oliver and her vehicle?</p> <p>20 A. I don't remember the specific date. It was</p> <p>21 around, you know, right before the use of force, but I</p> <p>22 don't remember the specific date. But she -- I</p> <p>23 observed multiple traffic violations while on patrol.</p> <p>24 I radioed in her -- her plate information.</p> <p>25 I recall asking if -- about if there was any</p>
<p>131</p> <p>1 weren't turned on?</p> <p>2 Q. Yes.</p> <p>3 A. Based on the video, yes. That's -- that's</p> <p>4 accurate, that I did not have on my lights until after</p> <p>5 I backed into her.</p> <p>6 Q. Okay. We can remove the video from the</p> <p>7 screen share. Moving on to another topic, do you</p> <p>8 remember responding to a breaking and entering on</p> <p>9 Evans Street during your employment at Vance County</p> <p>10 Sheriff's Office?</p> <p>11 A. It was so many -- no, I don't. There was so</p> <p>12 many B&Es.</p> <p>13 Q. You don't remember any particular</p> <p>14 situations?</p> <p>15 A. No. I can't even remember where Evan Street</p> <p>16 is. As you continue to ask questions, maybe something</p> <p>17 will come to my mind. I mean...</p> <p>18 Q. Well, you called in an incident, according</p> <p>19 to others. I'm not saying this is the truth. I'm</p> <p>20 asking you whether this happened.</p> <p>21 Did you call an incident about a breaking</p> <p>22 and entering call on Evans Street, and did you call it</p> <p>23 in in a panicked manner or a fast manner? Do you</p> <p>24 remember anything like that?</p> <p>25 A. I don't recall a B&E at Evans Street. There</p>	<p>133</p> <p>1 10-29s, which refers to warrants. Although Major</p> <p>2 Bullock -- well, then Captain Bullock, but now</p> <p>3 Major -- well, he's retired now. But Mr. Bullock</p> <p>4 alleged in the unemployment hearing that -- the</p> <p>5 appeal, rather, after I won in the initial one, the</p> <p>6 initial decision.</p> <p>7 But after that, he alleged that there was no</p> <p>8 recording of me asking for any information on her, and</p> <p>9 then he said that there was a distortion of what I</p> <p>10 meant by 10-29s. But nevertheless, I radioed her</p> <p>11 plate in.</p> <p>12 I did not have a laptop, so I waited for the</p> <p>13 information to come back. I did not pull her over. I</p> <p>14 just took the community-oriented policing philosophy</p> <p>15 the model approach, and I attempted to talk to her.</p> <p>16 And she was not happy and told me to write the ticket</p> <p>17 or whatever.</p> <p>18 And then I said, "I'm not trying to write</p> <p>19 you a ticket or anything. The only thing I'm trying</p> <p>20 to do was caution you on your violations because you</p> <p>21 put somebody else's life and safety at risk and</p> <p>22 jeopardy." And so that was it.</p> <p>23 Q. What's a 10-29?</p> <p>24 A. As I've just said, 10-29 warrants. Warrant</p> <p>25 service.</p>

<p>1 Q. And why did you first notice Ms. Oliver's 2 vehicle? 3 A. As I said, that she was committing several 4 violations. You have to look at my report I did on 5 it. I'm pretty sure I put it in there. 6 Q. Do you recall yourself what you saw? 7 A. Not off the top of my head, but there was 8 multiple violations. 9 Q. Were they, in your opinion, minor 10 violations? 11 A. Well, they were -- they were violations that 12 were major that could have had severe consequences 13 somebody had came into contact with her or she came 14 into contact with somebody, whether it had been a 15 personal car. But as far as the specific reasons, 16 you'll have to look at my report. I --I can't 17 remember off the top of my head. 18 Q. Okay. So did you run the vehicle 19 registration through 911 or the dispatcher? 20 A. Yes. 21 Q. What did you say to the dispatcher, do you 22 remember? 23 A. Well, you will have to pull the recording 24 and then send the recording to us. It's been a long 25 time ago, but I believe I gave them their plate, gave</p>	<p>134 1 remember happened? 2 A. Okay. 3 Q. How did you react to her response? 4 A. I was professional and I continued the 5 pursuit of my duties. 6 Q. Did you think what she said was 7 disrespectful? 8 A. I can't say that she was disrespectful. 9 Q. Can you say that she --- 10 A. As a matter of fact, she said something 11 about -- she said something about, "I know my rights 12 and some other things. But I didn't take her stuff as 13 being, like, hurting towards me. I didn't take it 14 personal. 15 Q. So what did you do when you returned to the 16 Sheriff's Office after this discussion with Ms. 17 Oliver? 18 A. Well, one, I checked the system, and I went 19 over to verify with 911. And because they came 20 across -- despite Major Bullock saying that there was 21 no tape that showed me asking for 10-29s or showed 22 giving me any information, and that is in the record. 23 And then him saying that there was 24 something, but there was a -- a distinction or a 25 distortion between what I was saying and what the 911</p>
<p>135 1 911 the plate. The North Carolina 10-28, the vehicle 2 information, the plate number. 3 And I remember asking if there were any 4 10-29s and -- that would've been for the person, and 5 if there was something attached to the vehicle that 6 would've came back, and I remember being told no. 7 But Major Bullock said that there's no radio 8 evidence of me asking any of that, and then says that 9 there was a distortion in what the 911 dispatcher 10 thought I was asking for and was not asking for. So I 11 don't know what's on that tape because you all haven't 12 provided it to us. 13 Q. So did you turn on your blue police lights 14 while talking to Ms. Oliver? 15 A. I don't remember -- I don't remember turning 16 on the lights or sirens. I remember just talking to 17 her in my car, and she was standing outside in the 18 PVA. 19 Q. So you said that she said, "Just give me a 20 ticket." Did she say anything else? 21 A. Yes. She's -- she mumbled some words about 22 "Give me a ticket," or whatever, or something to that 23 effect. "Let me go," or something. It's been a long 24 time. I cannot repeat verbatim what happened. 25 Q. Well, I'm just asking you to repeat what you</p>	<p>137 1 dispatcher believed or said it to me. And they 2 verified two warrants, said that they were still 3 active. 4 And I asked, "Well, why didn't you all tell 5 me this when I asked for it?" And they said, "Well, 6 it didn't show up." And that was a Caucasian male 7 dispatcher, skinny. I can't think of his name. Tall 8 and slender. I believe he drives a white truck, but I 9 can't think of his name. 10 Q. Thank you. Do you -- is this what you 11 normally did, you checked for warrants on people after 12 you stopped them for a traffic violation? 13 A. No. It wasn't something that I normally 14 did, but what they came back with so quickly was also 15 out of the ordinary. That they claimed they never -- 16 that Major Bullock claimed nobody ever said anything 17 about it to me. Excuse me. 18 And then says that, "Oh, there was a 19 distinction or a distortion," something he worded. So 20 I don't know what's on the tape, and I'm definitely 21 not going to be committing perjury or trying to commit 22 perjury. 23 Q. I understand. So you said it's not what you 24 normally do. Why did you do it in this instance? 25 A. As I just answered, they came back so</p>

<p>1 quickly with an answer.</p> <p>2 Q. So if there were outstanding warrants and</p> <p>3 you knew this when you first stopped Ms. Oliver. If</p> <p>4 that were the case, which it was not, according to</p> <p>5 your testimony, would you have arrested her at that</p> <p>6 point?</p> <p>7 A. She would have been arrested forthwith to</p> <p>8 the Magistrate without unnecessary delay.</p> <p>9 Q. Okay. Let's move to what you did after you</p> <p>10 saw that there were warrants. Did you go to Ms.</p> <p>11 Oliver's home?</p> <p>12 A. I did go to -- I did go to her home later.</p> <p>13 Q. Do you remember around what time that was,</p> <p>14 the first time?</p> <p>15 A. I don't have a -- I don't know the</p> <p>16 approximate time. I know one of the -- I believe one</p> <p>17 of the reports say 2:00. Maybe another report say</p> <p>18 12:00. I don't know what time it was.</p> <p>19 Q. Can you describe where she lived? Was it an</p> <p>20 apartment complex, development, something like that?</p> <p>21 A. I believe she lived in a -- there may have</p> <p>22 been a side road or it could have been a</p> <p>23 sub-development. But wherever it was, I believe it</p> <p>24 was double-wide -- she lived in a double-wide, if not</p> <p>25 a modular home.</p>	<p>138</p> <p>1 that she had the warrants?</p> <p>2 Q. Yes. The night where it might be stated</p> <p>3 that it was around 2:00 a.m., the first time.</p> <p>4 A. No. I'm not saying it was 2:00 a.m. I was</p> <p>5 saying the reports say either 12:00 a.m. or 2:00 a.m.</p> <p>6 Q. Yes.</p> <p>7 A. Now, there is a -- I don't want to get my --</p> <p>8 I don't want to get the facts distorted. I did a</p> <p>9 report about when there was -- I do remember there was</p> <p>10 a time that I did ask for backup.</p> <p>11 Q. Was this from Mr. Welborn, to refresh your</p> <p>12 memory?</p> <p>13 A. Yes -- yes. I don't want to get the facts</p> <p>14 distorted. I don't want to say something that is</p> <p>15 untruthful, but let me speak to what I remember. I</p> <p>16 requested backup from -- Sergeant Welborn.</p> <p>17 Sergeant Welborn told me to "Go and pick her</p> <p>18 ass up," and said, "Bo, you've been to handling</p> <p>19 school. You know what to do." And he said this in</p> <p>20 front of -- he said this in front of -- it's a Black</p> <p>21 deputy, African-American deputy, male deputy.</p> <p>22 I can't think of his name, but there was a</p> <p>23 third party there. And when it comes to me, I'll say</p> <p>24 it. But there was -- he said it in front of an</p> <p>25 African-American deputy.</p>
<p>139</p> <p>1 Q. Were her neighbors close to her in</p> <p>2 proximity?</p> <p>3 A. What do you mean, neighbors?</p> <p>4 Q. Were there other modular homes nearby hers?</p> <p>5 A. There were other homes there. It could've</p> <p>6 been a modular home or it might have been a</p> <p>7 double-wide. They were spaced out, but there were</p> <p>8 other people in that area.</p> <p>9 Q. And I know you're not going to have a</p> <p>10 perfectly accurate measurement, but if you have to</p> <p>11 estimate the amount of feet between the homes, or</p> <p>12 yards, what would be your estimate?</p> <p>13 A. I can't say.</p> <p>14 Q. Okay.</p> <p>15 A. Not even an estimate.</p> <p>16 Q. Okay. So why did you arrive to her home by</p> <p>17 yourself?</p> <p>18 A. To serve the warrants.</p> <p>19 Q. Did you request backup?</p> <p>20 A. I don't believe I requested backup. Not for</p> <p>21 that situation.</p> <p>22 Q. Why didn't you request for backup?</p> <p>23 A. Well -- hold on. Hold on. Let me go back.</p> <p>24 Hold on. Let me go back. Let me go back. We're</p> <p>25 talking about the night after I -- after I found out</p>	<p>141</p> <p>1 And despite me asking for backup, he told me</p> <p>2 to go pick her up and that I'd need no backup because</p> <p>3 I've been to handling school. And he told me to "go</p> <p>4 get the shit handled." And so that's what I'd done.</p> <p>5 Q. So without admitting that this happened at</p> <p>6 2:00 a.m., do you think it's appropriate to serve a</p> <p>7 warrant around 2:00 a.m.?</p> <p>8 A. Well, warrants are -- well, yes. Warrants</p> <p>9 have been served later than that by other deputies and</p> <p>10 supervisors. In fact, there have been search warrants</p> <p>11 served around that time at night and after that time,</p> <p>12 and then before that time.</p> <p>13 And it falls on the supervisor. As a</p> <p>14 supervisor, if he didn't want me to go and get her, to</p> <p>15 serve her with those felony warrants, then he wouldn't</p> <p>16 have to told me to go do it.</p> <p>17 Q. So you mentioned search warrants ---</p> <p>18 A. And the -- I just had his name. Go ahead.</p> <p>19 It's going to come back to me.</p> <p>20 Q. So you mentioned search warrants. What</p> <p>21 about arrest warrants around 2:00 a.m.?</p> <p>22 A. I believe that there were arrest warrants</p> <p>23 done late night, early morning. Most certainly, we</p> <p>24 have served arrest warrants on day shift, night shift,</p> <p>25 afternoon. Graveyard, which is, you know, late night</p>

<p>142</p> <p>1 Night shift, early morning. So -- and these are 2 felony warrants, which is a greater crime than a 3 misdemeanor. 4 Q. So you mentioned that these warrants are 5 served at many times. Do you know when the most 6 common time period is that they're served? Is it the 7 morning, the afternoon, the night? 8 A. They are served during the day, and then I 9 know some supervisors, once they -- I know one has 10 said something about, he tried not to go later than 11 10:00. Another said they tried not to go later than 12 11:00. Then, another one said they don't got no time 13 for it. Some say 12:00. 14 And these were deputies talking as well, so 15 I can't give you the specific names of these people, 16 but it was -- I mean, it was a -- it was more than one 17 or two or even three. 18 But in terms of a specific policy, those 19 were felony warrants, so the supervisor told me to go 20 served them, which was Welborn, in front of Deputy 21 Deputy Anton, Anton Edwards. Sergeant Welborn told me 22 in front of Deputy Edwards to go and pick her up, 23 along with some curse words. 24 Q. Is it Anton or Antwon? 25 A. I believe it is Anton, A-N-T-O-N, maybe with</p>	<p>144</p> <p>1 third-party deputy, Deputy Edwards. 2 Q. Well, notwithstanding whatever the 3 supervisor said, I'm asking you. In your experience, 4 is it more risky to serve a warrant at 2:00 a.m. than, 5 let's say, 5:00 p.m.? 6 A. It may or may not be risky. Someone may 7 make the argument of, "Well, it's late night, early 8 morning. We don't know who's knocking at that time 9 night. It could be somebody breaking in the house," 10 or somebody might not agree with that. 11 I mean, it's just based on the perceptions 12 of whomever mind is -- you know, whoever is in the 13 house and what's going through their mind and what 14 Q. But what about from the standpoint of the 15 officer, which is you in this situation? 16 A. Well, that's the thing. Warrants are served 17 throughout, as I previously said -- as I previously 18 answered, warrants are served throughout day shift and 19 night shift. From day, morning, noon, afternoon, 20 evening, night, late night, early mornings. 21 Q. All right. But I'm not asking you when 22 warrants are served. I'm asking you, is there more of 23 a risk based on your experience --- 24 A. And I answered you --- 25 MR. MCGURL: Objection. Asked and</p>
<p>143</p> <p>1 an E to it. Might be an I in there. I don't know, 2 but Deputy Edwards. 3 Q. So you mentioned that some one or more 4 people said, "No later than 10:00." You can't tell me 5 who that was? 6 A. This was after -- this was like -- a lot of 7 this stuff came up after the incident took place. 8 Most certainly, when I was with Marin, we served 9 warrants later than 10:00, and sometimes later than 10 11:00. 11 Q. Had you ever served another warrant at 2:00 12 a.m. before this one? 13 A. I don't know the times. I know that I 14 served multiple warrants, whether misdemeanor or 15 felony, night shift, and served arrest warrants, I 16 mean, the same time. In terms of, like, the specific 17 cases, I'm not sure. You all would have to curate the 18 database. 19 Q. So based on your experience as a law 20 enforcement officer, are there additional risks that 21 come when you would serve a warrant at 2:00 a.m.? 22 A. There may or may not be any additional risk. 23 But once more, the supervisor didn't -- if the 24 supervisor thought it was risky, then the supervisor 25 shouldn't have told me to go serve it in front of a</p>	<p>145</p> <p>1 answered. 2 MR. CASTRO: Have you entered a notice 3 of appearance in this case, Mr. White -- I mean, Mr. 4 McGurl? 5 THE WITNESS: I'm sorry? 6 MR. CASTRO: I'm sorry. I don't want 7 objections from two attorneys, one who hasn't entered 8 a notice of appearance in this case. I'm going to get 9 back to Mr. White here. 10 Q. (Mr. Castro) You did not answer my 11 question. You --- 12 MS. ROBINSON: I think at this point, 13 you're badgering the witness. He has answered that 14 question five times. 15 MR. CASTRO: No, he hasn't. He's told 16 me what his supervisor did. 17 Q. (Mr. Castro) Okay. Anyways, you can still 18 answer the question, of course, unless you're 19 instructed not to. Is there a greater risk in your 20 opinion, not from the opinion of your supervisor or 21 from the person in the house, when you serve a warrant 22 at 2:00 a.m. versus 5:00 p.m., yes or no? 23 A. There may or may not be a greater risk. 24 MS. ROBINSON: And that's your answer. 25 MR. CASTRO: I would ask Opposing</p>

<p style="text-align: right;">146</p> <p>1 Counsel not to make commentary during the deposition.</p> <p>2 MS. ROBINSON: I'm telling you, as</p> <p>3 Opposing Counsel, that's your answer. And that has</p> <p>4 been his answer each time you asked that question.</p> <p>5 MR. CASTRO: And I'll refer you to</p> <p>6 Federal Rule of Civil Procedure 30, which says you</p> <p>7 cannot make speaking objections ---</p> <p>8 MS. ROBINSON: Don't -- don't badger</p> <p>9 the witness.</p> <p>10 MR. CASTRO: I'll object to your --</p> <p>11 your coaching the witness ---</p> <p>12 MS. ROBINSON: I'm not coaching.</p> <p>13 You're badgering the witness.</p> <p>14 MR. CASTRO: Again, I'll refer you to</p> <p>15 Federal Rule of Civil Procedure 30 and ask you not to</p> <p>16 make speaking objections.</p> <p>17 Q. (Mr. Castro) Did you announce yourself as a</p> <p>18 deputy sheriff when you first visited Ms. Oliver's</p> <p>19 home?</p> <p>20 A. I can't recall.</p> <p>21 Q. Do you recall if you knocked on any of her</p> <p>22 doors?</p> <p>23 A. Yes. I did knock on her door.</p> <p>24 Q. Did you try to look inside to see if anyone</p> <p>25 was there?</p>	<p style="text-align: right;">148</p> <p>1 this time?</p> <p>2 A. I don't believe that I asked another officer</p> <p>3 to help me. Because I had already received</p> <p>4 instructions from Sergeant Chris Welborn to go to the</p> <p>5 house by myself and to handle it, saying that I've</p> <p>6 been to handling school and to "go and get her ass,"</p> <p>7 amongst some other things around that effect. So no,</p> <p>8 I didn't ask anybody for backup.</p> <p>9 Q. Did you want backup?</p> <p>10 A. Well, I asked for a second officer the first</p> <p>11 time with Welborn and he denied it.</p> <p>12 Q. Did you bring this to the attention of any</p> <p>13 other supervisors or Sheriff White?</p> <p>14 A. Yes. I brought it to the attention of</p> <p>15 Sheriff White. I brought it to the attention of</p> <p>16 Argretta Johnen and Captain Weldon Wallace Bullock</p> <p>17 writing.</p> <p>18 Q. Before you went to the home?</p> <p>19 A. No. Not before I went to the home.</p> <p>20 Q. Okay. So let's discuss what happened when</p> <p>21 you arrived. Where did you park in relation to her</p> <p>22 home?</p> <p>23 A. In her driveway.</p> <p>24 Q. And did you go up to her door?</p> <p>25 A. Yes, I walked to her door.</p>
<p style="text-align: right;">147</p> <p>1 A. I can't recall.</p> <p>2 Q. Have you ever been visited by a deputy or</p> <p>3 police officer while at home?</p> <p>4 A. Yes.</p> <p>5 Q. Have you ever had a law enforcement officer</p> <p>6 visit you after 12:00 a.m.?</p> <p>7 A. I don't know if I've had one to visit. No.</p> <p>8 I can't say that I've had one to the visit that late.</p> <p>9 Q. Would it be reasonable for a woman alone to</p> <p>10 open the door at 2:00 a.m. when a man is knocking at</p> <p>11 her door?</p> <p>12 A. It may or may not be reasonable. But to</p> <p>13 answer your question, to go a little bit further.</p> <p>14 According to the statements, Ms. Oliver wasn't alone.</p> <p>15 I believe there was something in there that somebody</p> <p>16 else was in the house with her.</p> <p>17 Q. So let's talk about the use of force</p> <p>18 incident on October 22nd, 2018. Did you go to her</p> <p>19 property again after there was no answer?</p> <p>20 A. Yes. I went to her house after she didn't</p> <p>21 answer.</p> <p>22 Q. When was that?</p> <p>23 A. I believe, as you alluded to, the use of</p> <p>24 force.</p> <p>25 Q. Did you ask other officers to go with you</p>	<p style="text-align: right;">149</p> <p>1 Q. Do you remember what happened after that?</p> <p>2 Can you describe to me?</p> <p>3 A. Once more, I'm going to refer you to the</p> <p>4 reports, the use of force report, incident report, and</p> <p>5 Captain Bullock's alleged investigative report. It's</p> <p>6 been a long time since stuff has happened, but I can</p> <p>7 touch briefly that I went to her house.</p> <p>8 She -- and told her that I -- she had</p> <p>9 warrants. She had cooperated. I noticed that she</p> <p>10 didn't lock her front door or side door, whichever one</p> <p>11 it was. And she said, "Thank you," and she went and</p> <p>12 locked it, and said, "Thank you" again, walked</p> <p>13 outside. She said I had to pull the door and she said</p> <p>14 something was wrong with the locking device. So I</p> <p>15 pulled it and ---</p> <p>16 Q. Did you talk at all ---</p> <p>17 A. --- she made sure that it was locked. I'm</p> <p>18 sorry?</p> <p>19 Q. Did you have any conversations during this</p> <p>20 time other than, "Thanks for locking my door"?</p> <p>21 A. Well, yes. And I told her that she was</p> <p>22 under arrest and -- you know, for the warrants. As I</p> <p>23 previously told her, she had warrants, and she -- she</p> <p>24 acted as if she was going to cooperate up until she</p> <p>25 wouldn't cooperate.</p>

<p>150</p> <p>1 And she wanted to -- she didn't want to</p> <p>2 cooperate with me handcuffing her. She didn't want to</p> <p>3 go to jail. It was a -- it was a lot of stuff. And I</p> <p>4 told her, I said, "You have to go."</p> <p>5 Q. Did she ask you to call other officers to</p> <p>6 the scene?</p> <p>7 A. She may have asked for another officer, but</p> <p>8 as I -- it was something to that effect, "Can somebody</p> <p>9 -- can somebody else take me?" She even asked -- I</p> <p>10 think she may have asked something to the effect of</p> <p>11 "Can I see the warrant?" Or something to that effect.</p> <p>12 It's been a long time, so we'd have to rely</p> <p>13 on the report. But I did everything I could to get</p> <p>14 her to comply and she would not cooperate.</p> <p>15 Q. When she said to someone -- "Can someone</p> <p>16 else take me," what was your response?</p> <p>17 A. I told that I'm here to handle the matter</p> <p>18 and that if she cooperated with me -- and I believe</p> <p>19 put this in my report, that I would recommend to the</p> <p>20 magistrate judge a bond reduction based on her</p> <p>21 cooperation. And she was like, "Okay."</p> <p>22 And then when I tried to put the handcuffs</p> <p>23 on, she just -- she did not cooperate at all. She --</p> <p>24 became aggressive, resistive, assaultive,</p> <p>25 non-cooperative, non-compliant.</p>	<p>152</p> <p>1 conversational tone? Was she yelling, was she</p> <p>2 screaming? Can you describe the tone?</p> <p>3 A. When after the door was locked and we walked</p> <p>4 to the car, before I handcuffed her, or after I</p> <p>5 handcuffed her?</p> <p>6 Q. Let's start with before you handcuffed her,</p> <p>7 taking her to the car.</p> <p>8 A. Okay. She was cooperative, as I said.</p> <p>9 Q. And then when did she start acting</p> <p>10 uncooperative?</p> <p>11 A. When I tried to handcuff her to place her</p> <p>12 under arrest.</p> <p>13 Q. Had she said anything before you tried to</p> <p>14 handcuff her other than, "Thanks for locking my</p> <p>15 doors"?</p> <p>16 A. Like I said, it was -- it's been a long</p> <p>17 time. We'd have to refer back to the incident report,</p> <p>18 use of force report.</p> <p>19 Q. So when you started trying to handcuff her,</p> <p>20 how did she react?</p> <p>21 A. She did -- she was not cooperative when I --</p> <p>22 she was uncooperative when I tried to handcuff her.</p> <p>23 Q. What do you mean, "uncooperative"? Can you</p> <p>24 describe her actions?</p> <p>25 A. She resisted arrest. She resisted arrest</p>
<p>151</p> <p>1 And it resulted in a soft hands technique,</p> <p>2 an improved takedown maneuver, straight arm bar</p> <p>3 applied. While it's unfortunate her arm was</p> <p>4 fractured, despite the paramedics, two of them, saying</p> <p>5 three different times that nothing was wrong with her.</p> <p>6 She had evidently suffered a fracture.</p> <p>7 Q. Okay. Taking a step back to when she was</p> <p>8 saying all of these things like, "Can I see a warrant,</p> <p>9 can someone else get me," why didn't you just call</p> <p>10 someone else to handle the situation when she was</p> <p>11 acting like this?</p> <p>12 A. I'm sorry. Are you saying that she said</p> <p>13 that she asked to see a warrant?</p> <p>14 Q. You said that.</p> <p>15 A. Is it -- that's -- I said that, like, on the</p> <p>16 deposition or in the reports?</p> <p>17 Q. I think it was today that you said it. I'm</p> <p>18 not sure if it's in a report, but when she was saying</p> <p>19 all of these things about the arrest that you were</p> <p>20 describing, how was she sounding? Was she yelling</p> <p>21 was she crying?</p> <p>22 A. Repeat the question.</p> <p>23 Q. When she was -- when you were in the process</p> <p>24 of escorting her to your patrol vehicle or to your</p> <p>25 vehicle and she was speaking to you, was it normal</p>	<p>153</p> <p>1 unlawfully. She became aggressive and she attacked</p> <p>2 me. She was assaultive. And I put it in my report,</p> <p>3 of what she'd done. And I grabbed her arm, the lower</p> <p>4 arm, the upper arm, and I did an arm bar takedown</p> <p>5 where I got her to the ground.</p> <p>6 Q. When you say she was resisting, was she</p> <p>7 physically resisting?</p> <p>8 A. Yeah. She was physically resisting arrest.</p> <p>9 Q. Was she trying to squirm, trying to hit you?</p> <p>10 A. Well, she wasn't trying to hit me because</p> <p>11 she did hit me, and I put that in the report. She was</p> <p>12 very adamant about not going to jail.</p> <p>13 Q. Was she verbally resistant as well?</p> <p>14 A. Yes.</p> <p>15 Q. Why didn't you show her the actual warrant</p> <p>16 when she asked you to?</p> <p>17 A. One, I didn't have -- I don't believe I had</p> <p>18 a warrant with me. And even if I did have a warrant</p> <p>19 with me, when I tell someone they're under arrest,</p> <p>20 they have to comply. That's a statute.</p> <p>21 Q. Do you usually -- during your time at the</p> <p>22 Vance County Sheriff's Office, did you usually arrest</p> <p>23 people without having the actual warrant?</p> <p>24 A. It wasn't uncommon for me to, because I</p> <p>25 didn't have a laptop to even show them a warrant.</p>

<p>154</p> <p>1 Q. Did you have the capability to print a</p> <p>2 warrant at the Sheriff's Office?</p> <p>3 A. I could've -- I could've printed a warrant</p> <p>4 at the Sheriff's Office, but we were already given out</p> <p>5 activity -- well, no. Not activity -- well, what is</p> <p>6 it called? It's like a -- it's a warrant log.</p> <p>7 If we have -- if we're assigned to North or</p> <p>8 South, it's a warrant log with the names of people.</p> <p>9 Sometimes they have a picture. Sometimes they don't.</p> <p>10 Sometimes it has other identification -- not other</p> <p>11 identification, but like -- like a date of birth.</p> <p>12 Like, in terms of identification, like photo, other</p> <p>13 identifying markers.</p> <p>14 Q. Okay. So you mentioned that she was acting</p> <p>15 aggressively. What did you do to try to de-escalate</p> <p>16 the situation?</p> <p>17 A. First, I talked to her and with her. I did</p> <p>18 everything I could to de-escalate the situation. I</p> <p>19 even went above and beyond by telling her -- excuse</p> <p>20 me. Excuse me. If she complied, I would speak go</p> <p>21 on her behalf to the judge. I told her she had to go</p> <p>22 to jail. She is the one that escalated the matter</p> <p>23 because all she had to do was comply.</p> <p>24 Q. Did you ever try to push her into the patrol</p> <p>25 car or push her against the patrol car?</p>	<p>156</p> <p>1 you're referring to?</p> <p>2 Q. Yes.</p> <p>3 A. Yes.</p> <p>4 Q. It goes on to say, "White, you've been to</p> <p>5 handling school - Bo, you don't need me, do I have to</p> <p>6 hold your hand with everything? Go serve the damn</p> <p>7 warrant and if you need me just call me and I will</p> <p>8 come up there go serve the warrant JJ!"</p> <p>9 So is it true that Mr. Welborn said, "If you</p> <p>10 need me just call me and I will come up there"?</p> <p>11 A. Mr. Welborn told me prior to, to go serve</p> <p>12 warrant and to get it done. His instructions were</p> <p>13 clear. Now, he said, "If you need me, just call me."</p> <p>14 Unfortunately, during the height of the</p> <p>15 situation, the intensity of it with be use of force is</p> <p>16 what I'm referring to, that -- I had to deal with the</p> <p>17 threat at the time.</p> <p>18 So it wasn't that I was trying to ignore</p> <p>19 calling him. I had a female subject that was</p> <p>20 attacking me, and truthfully, he wouldn't need me to</p> <p>21 call him had he came up there in the first place</p> <p>22 instead of directing me to go do it and to get it</p> <p>23 done.</p> <p>24 Q. So when during the process of arresting Ms.</p> <p>25 Oliver did you sense that she was starting to resist</p>
<p>155</p> <p>1 A. I tried to get her into my car to transport</p> <p>2 her to the Magistrate's Office.</p> <p>3 Q. Was this before she was handcuffed?</p> <p>4 A. This is when I tried to handcuff her and she</p> <p>5 was resisting, so I could not, like, force the</p> <p>6 handcuffs on her. And unfortunately, she attacked me</p> <p>7 assaulted me, and it led to an arm bar.</p> <p>8 MR. CASTRO: Can we go off the record?</p> <p>9 THE COURT REPORTER: Off the record at</p> <p>10 4:04 p.m.</p> <p>11 (Off-record comments)</p> <p>12 THE COURT REPORTER: Back on the record</p> <p>13 at 4:04 p.m.</p> <p>14 Q. (Mr. Castro) So you tried to get her into</p> <p>15 the patrol car before you had the handcuffs on her?</p> <p>16 A. I tried to handcuff her and get her into my</p> <p>17 patrol car. Unfortunately, it didn't work.</p> <p>18 Q. Okay. So if we can look at the Exhibit 3,</p> <p>19 which is the amended complaint. And we can go to</p> <p>20 Paragraph 123, and that is on Page 23 of 47.</p> <p>21 A. All right.</p> <p>22 Q. Does this appear to be an allegation that</p> <p>23 you made?</p> <p>24 A. "Sergeant Welborn instructed Mr. White,"</p> <p>25 "to serve the two felony warrants." That's what</p>	<p>157</p> <p>1 or she started to act like she's not going to comply.</p> <p>2 When did you realize that?</p> <p>3 A. I -- well, when she started resisting, I</p> <p>4 felt that I could talk to her. That's why I gave the</p> <p>5 options to her, you know, prior to, to comply. In</p> <p>6 terms of a specific point, I mean, I'm not going to be</p> <p>7 able to pinpoint exactly.</p> <p>8 But I can definitely say, when she started</p> <p>9 attacking me, that made it very clear that there was</p> <p>10 no talking anything to her. Anything in -- there</p> <p>11 was -- I wasn't going to be able to talk her into</p> <p>12 submitting to the handcuffs or trying to get her under</p> <p>13 arrest.</p> <p>14 Q. Why did you not use the pepper spray that</p> <p>15 you had on you?</p> <p>16 A. One, I -- one, I am not certified in using</p> <p>17 pepper spray. In fact, me having the pepper spray</p> <p>18 without going through the proper training for it is a</p> <p>19 liability, and it may or may not be a policy violation</p> <p>20 because you're required to have training for it and</p> <p>21 the Sheriff's Office didn't provide it.</p> <p>22 Another thing, Ms. Oliver had on glasses</p> <p>23 that I believe would have caused the steady stream to</p> <p>24 ricochet and it was dark, and that will place me in</p> <p>25 danger and jeopardy. My safety would be at risk,</p>

<p>158</p> <p>1 especially if it would have hit me, because it's 2 designed to, you know, disable or incapacitate, at 3 least temporarily. 4 So -- and not only that. The use of force 5 report -- not use of force report, the use of force 6 continuum from my BLET training, basic law enforcement 7 training, placed self hands techniques before chemical 8 munitions. So I was in compliance with the training 9 protocols, what I perceive to be, you know, policy. 10 Q. So you referenced the protocol. Do you 11 think an arm bar takedown comes before pepper spray 12 that --- 13 A. It does. It's a soft hand technique. It 14 does. 15 Q. Which one of those two is more likely to 16 cause an injury? 17 A. Well, any -- any of them. I can't say this 18 one would cause more of an injury than this one. Use 19 of force is designed not to be pleasant outside of 20 de-escalation, all right? 21 Q. So why did you have pepper spray on you if 22 you weren't trained to use it? 23 A. Because I was given it and I was told that I 24 was -- that we would -- that the deputies who need 25 training for it was going to get training for it, and</p>	<p>160</p> <p>1 Q. As a correctional officer or corrections 2 officer, how many times did you use pepper spray? 3 A. I don't know a specific amount of time. I 4 mean, it wasn't a lot in terms of like ten, 15, 20, 5 but maybe a handful of times during -- throughout my 6 three-year employment. 7 Q. So is it more than five? 8 A. I said a handful of times, approximately. 9 Q. Were you trained as a corrections officer to 10 use it? 11 A. Yes. I was trained as a correctional 12 officer to use pepper spray on inmates, working under 13 the jurisdiction of the Department of Public Safety. 14 Q. How were you trained? 15 A. The State trained me. 16 Q. Do you know --- 17 A. To deal with prisoners. 18 Q. Do you know around what time or date you 19 were trained? 20 A. Maybe around November or December of 201 21 Q. Do you know what agency you trained with? 22 A. These were for corrections officers only, 23 not sworn law enforcement in terms of police or 24 deputies. 25 Q. Can you describe how they trained you?</p>
<p>159</p> <p>1 I never did. 2 Q. Before --- 3 A. That would be a question -- I'm sorry? 4 Q. I'm sorry. Were you finished? 5 A. No, go ahead. 6 Q. Before the Ms. Oliver incident, had you ever 7 used pepper spray on anyone? 8 A. Well, I have -- you said -- are you asking 9 me if I had used pepper spray? 10 Q. Before the Ms. Oliver incident in October of 11 2018? 12 A. At the Sheriff's Office, is what you're 13 talking about, before? 14 Q. At anytime? 15 A. At anytime. Yes. I had used pepper spray 16 before. 17 Q. When was that? 18 A. When I worked as a corrections officer and I 19 was not a sworn law enforcement officer. 20 Q. Was that the only time? 21 A. Yes. 22 Q. How many times as a corrections officer did 23 you use pepper spray? 24 A. How many times does a corrections officer 25 what?</p>	<p>161</p> <p>1 A. That's been a long time ago. 2 Q. Did you actually have to use it during your 3 training? 4 A. I remember it being used on me. I don't 5 know -- I don't remember spraying anybody else. 6 Q. Did they teach you how to spray the device? 7 A. They showed us how to spray pepper spray. 8 Q. Did they train you on where you should spray 9 it? 10 A. I'm pretty sure it was covered in the 11 curriculum. It's been a long time ago. 12 Q. So can you give me any other details about 13 the curriculum that --- 14 A. No. No, I can't. 15 Q. Okay. Was this at the Bertie Correctional 16 Facility? 17 A. Yes. 18 Q. All right. So you said you use an arm bar 19 takedown. Where did you learn how to use this? 20 A. BLET, basic law enforcement training. 21 Q. Was it part of the course materials? 22 A. It was a part of the curriculum. 23 Q. Did they demonstrate to you how to use it, 24 or did they just refer to what it is? 25 A. They referred to what it is and they</p>

<p>162</p> <p>1 demonstrate it.</p> <p>2 Q. And can you describe just physically how to</p> <p>3 complete an arm bar takedown?</p> <p>4 A. I can't give you the step-by-step directions</p> <p>5 because it's been a long time, but it's in the</p> <p>6 training manual and it can be pulled.</p> <p>7 Q. But you used that takedown, right?</p> <p>8 A. Yes. And it's been a long time.</p> <p>9 Q. What do you remember about what you did?</p> <p>10 A. As I stated earlier, that I remember placing</p> <p>11 one of my hands on her lower arm and another hand</p> <p>12 towards her upper arm, and I believe I rotated. I</p> <p>13 can't remember everything in terms of where I could</p> <p>14 take control of her arm and take her down to the</p> <p>15 ground to get her under control.</p> <p>16 But in terms of the specific steps, in terms</p> <p>17 of stepping back or rotating the arm or however it</p> <p>18 was done, I would have to rely on the training manual.</p> <p>19 And that can be pulled, put into evidence. But I</p> <p>20 relied on my training, education, and experience to</p> <p>21 effect the arrest, using the straight arm bar</p> <p>22 technique.</p> <p>23 Q. So after you use the straight arm bar</p> <p>24 technique, what happened? What did you do after that?</p> <p>25 A. Well, she was complaining of her back, her</p>	<p>164</p> <p>1 Q. But who did you say was the custodian again?</p> <p>2 A. It may be 911. The emergency services,</p> <p>3 emergency management, whoever it is with the 911</p> <p>4 center.</p> <p>5 Q. Have you asked them for the tapes?</p> <p>6 A. No. I haven't asked anybody for anything.</p> <p>7 Q. All right. So you said you called it in.</p> <p>8 Do you remember how you called it in, what you said?</p> <p>9 A. As I just said, I do not remember everything</p> <p>10 that was said. But I did ask for backup, officer</p> <p>11 backup at some point in time, and also asked for EMS.</p> <p>12 Q. So when she -- when Ms. Oliver was</p> <p>13 complaining, how did you react to that? Did you get</p> <p>14 panicked?</p> <p>15 A. No. I didn't panic. It was important that</p> <p>16 she get medical services and it was also important</p> <p>17 that I have backup there. This woman had just accus-</p> <p>18 me of basically police brutality by basically saying</p> <p>19 that I broke her spine, her back, her arms, her legs,</p> <p>20 her ankles. Everything was broken according to her.</p> <p>21 And had she not been aggressive, assaultive,</p> <p>22 attacking me, then -- and resisting arrest, then the</p> <p>23 soft hands technique would've never been on her. She</p> <p>24 would have been on her way to the Sheriff's Office for</p> <p>25 processing and before the Magistrate.</p>
<p>163</p> <p>1 neck, her arms, her ankles, her legs, her spine,</p> <p>2 everything was broke. Let me skip that.</p> <p>3 I did call for -- let's see. I don't have</p> <p>4 the reports in front of me, but I -- I remember</p> <p>5 calling for assistance, for -- for backup, and I also</p> <p>6 remember calling for assistance, for her medical</p> <p>7 assistance.</p> <p>8 You all didn't provide us the tapes despite</p> <p>9 it being public record. I can't say word for word</p> <p>10 what's on those tapes, and I'm definitely not going</p> <p>11 to get hammed up in any perjury or deception allegations.</p> <p>12 I can't remember everything that I did and everything</p> <p>13 that was said, but I relied on my training, education</p> <p>14 and experience to effect the arrest.</p> <p>15 Q. You said that we did not provide you the</p> <p>16 tapes. Do you know who has custody of those tapes?</p> <p>17 A. Your client.</p> <p>18 Q. Do you know that -- if the Sheriff Office</p> <p>19 has custody of the tapes?</p> <p>20 A. Well, I'm pretty sure they have a copy of</p> <p>21 it. 911 emergency services, emergency management</p> <p>22 whomever, has the 911 -- recordings as the custodian</p> <p>23 -- custodian. But at the same time, it's public</p> <p>24 record and I'm pretty sure that you all have a copy of</p> <p>25 that tape.</p>	<p>165</p> <p>1 MR. CASTRO: Off the record.</p> <p>2 (Off the record: 4:20 p.m. to 4:20 p.m.)</p> <p>3 Q. (Mr. Castro) So did dispatch ask you for</p> <p>4 more details after you called it in? To your</p> <p>5 knowledge or to your recollection, of course.</p> <p>6 A. They may have. I'm pretty sure they asked</p> <p>7 for details. Somebody did, but as far as specifically</p> <p>8 what they asked for it, I don't -- I can't remember</p> <p>9 verbatim what they said.</p> <p>10 Q. Do you remember who arrived at the scene?</p> <p>11 A. Yes. I don't know the persons, but there</p> <p>12 was two paramedics first and then maybe a minute or</p> <p>13 two, no longer than three, Sergeant Welborn arrived</p> <p>14 and he asked what we had. I told him, and we --</p> <p>15 Goolsby arrived, blaring lights and sirens, I believe.</p> <p>16 And at some point in time, well after</p> <p>17 Welborn got on the scene, when he -- after he got on</p> <p>18 the scene, Edwards showed up. I do remember Welb-</p> <p>19 or after he got on scene, downgrading the call. But I</p> <p>20 mean, it was just -- I mean, it was just us, so nobody</p> <p>21 else came out there.</p> <p>22 Q. Do you remember what you told the</p> <p>23 paramedics, if anything?</p> <p>24 A. It's been a long time. I didn't see any</p> <p>25 reports from any paramedics, but I told them that</p>

<p>166</p> <p>1 she -- something to the effect that she was claiming 2 her arm is broken. First paramedic examined her 3 said, "Well, nothing wrong with her." 4 Welborn pulled up. She -- he got out of the 5 car and came up there. Second paramedic examined 6 and said, "Well, nothing wrong with her." And she 7 like, "But I'm in pain and everything broken. My 8 is hurting real bad." 9 And so the paramedic again examined her and 10 he said, "Well, nothing wrong with her." And so 11 that point in time, Sergeant Welborn took custody 12 her and she was like, "Well, where we -- where we 13 going?" And he said, "To jail." And she said, "But 14 I'm in pain." And he said, "Come on. You're going 15 jail." 16 She said, "No, I'm -- I'm hurting." And he 17 said, "Ma'am, you're going to jail." And she said, 18 "But my arm, my arm," and she started screaming 19 crying. So the director of EMS pulled up and she 20 screaming that her arm was broken, her arm was 21 Or the chief of EMS, I believe the agency 22 head, pulled up. And he examined her and he said 23 something to the effect of, "It's broken or 24 fractured." And so at that point in time, EMS 25 prepared to gurney her and transport her to Maria</p>	<p>168</p> <p>1 Q. Did you know that she was diagnosed with a 2 and fractured humerus on her upper arm? 3 A. Well, I just said that I knew that she had a 4 fracture to the humerus, so yes. 5 Q. Did you fracture her humerus? 6 A. Well, I did not break her arm, if that's 7 what you're asking, okay? 8 Q. You did. 9 A. It -- that was never my intent, to break her 10 arm. She resisted arrest. She fought me. I did an 11 approved subject control technique, and as a result of 12 her resistance and any other factor, her arm was 13 broken. 14 She didn't have to go down that path of 15 having a possible use of force. I did my best as a 16 law enforcement officer to de-escalate, to talk to 17 her, to calm her down and even said that I will make 18 a recommendation for bond reduction. 19 Q. As a result of the technique you used, was 20 her arm broken? 21 A. I can't say that as a result, that it was 22 broken. What I can say is there were multiple 23 factors. I'm not going to say that I broke her arm or 24 the straight arm bar takedown broke her arm. 25 Q. What else could have broken her arm?</p>
<p>167</p> <p>1 Parham Hospital in Henderson, and that was it. 2 Q. Thank you. You said Mr. Welborn arrived at 3 the scene. Do you remember talking to him about it at 4 all? 5 A. Yes. In terms of verbatim words, I'm unable 6 to provide that, but he asked what had happened. 7 Q. And you don't remember verbatim, but do you 8 remember generally what you responded? 9 A. I told him, "She's complaining that her arm 10 is broke." I believe I told him I did a takedown on 11 her, took her to the ground to handcuff her after she 12 attacked me, et cetera. But in terms of the -- the 13 specifics like directly repeating it as it was said, 14 I -- it's been a long time ago and we haven't read 15 the reports. 16 Q. Do you know if Ms. Oliver had any injuries 17 after the October 22nd incident? 18 A. Injuries from what? 19 Q. From the arm bar takedown. 20 A. Well, the -- as I said, the chief or the 21 director of EMS, he said that, "Yeah. It's broken 22 fractured," and so they gurneyed her. I found out 23 later that -- later that night shift that she had a -- 24 her arm was fractured, the humerus bone or something 25 like that.</p>	<p>169</p> <p>1 A. Her resistance. Her -- her resisting lawful 2 orders. Her aggression. Her -- her physical 3 resistance. Her aggression towards me, aggressiveness 4 towards me. 5 Q. So you think she resisted so much that she 6 broke her own arm? 7 A. She attacked me, her resistance. And it's 8 also in the training protocols, the guidelines that I 9 believe something to the effect of, "Physical 10 resistance or aggressiveness, not being in 11 compliance," amongst other things, "can enhance the 12 likelihood of an injury." I'm not calling it 13 verbatim, but once I look at whatever it is, I'll know 14 it. I'll know it for myself. 15 But I definitely didn't go there to break 16 her arm and I am not going to say that I broke her 17 arm. After all, she was cleared that weren't nothing 18 wrong with her arm two -- three times by two 19 paramedics. And at the same time, even if her arm did 20 broke, she bears the responsibility. 21 (DEPOSITION EXHIBIT 22 NUMBER 19 WAS MARKED 23 FOR IDENTIFICATION) 24 Q. (Mr. Castro) I would like to present you 25 with Exhibit 19, and I would like you to review the</p>

<p>170</p> <p>1 first page and tell me what this document is?</p> <p>2 (Witness complies)</p> <p>3 A. It appears to be aftercare instructions for</p> <p>4 her, for Ms. Oliver.</p> <p>5 Q. Is it true that after the incident, Ms.</p> <p>6 Oliver went to Maria Parham Health?</p> <p>7 A. Yes.</p> <p>8 Q. Is it true that this incident occurred on</p> <p>9 December 22nd, 2018?</p> <p>10 A. I don't recall it occurring on December</p> <p>11 22nd, 2018.</p> <p>12 Q. Okay. Do you know around what time this</p> <p>13 incident occurred?</p> <p>14 A. Around October, 2018.</p> <p>15 Q. Do you remember the time of day it was? Was it</p> <p>16 7:00 p.m., 8:00 p.m., anything like that?</p> <p>17 A. I would have to go back to the incident</p> <p>18 reports. It -- I mean, it was at night, maybe 8:00 or</p> <p>19 9:00. At somewhere around there approximately, but</p> <p>20 night shift. It was definitely, I believe, before</p> <p>21 midnight.</p> <p>22 Q. Okay. And reading this first page, it says</p> <p>23 on the first three paragraphs, "You have a fracture of</p> <p>24 the humerus." Paragraph 2: "The humerus is the long</p> <p>25 bone in your upper arm. Your fracture is in the top</p>	<p>172</p> <p>1 Q. Do you remember roughly what you might have</p> <p>2 discussed?</p> <p>3 A. Yes. I asked him what the doctors are</p> <p>4 saying and he said that they are saying it's a</p> <p>5 fracture, and he told me again that Watkins told him</p> <p>6 just to make sure I had my incident report, write it</p> <p>7 up.</p> <p>8 He told me that the family was at the</p> <p>9 hospital, and that they were asking for me and were</p> <p>10 asking where he was. I said, "And what did you tell</p> <p>11 them?" He said, "I told them where you was." And I</p> <p>12 was like, "If they know like I know, they might not</p> <p>13 want to come into there and bother you."</p> <p>14 And I told him, I said, "Well, you know, I'm</p> <p>15 trying to finish up my report." And he was like,</p> <p>16 "Yeah. Welborn is going to come up there because the</p> <p>17 Magistrate -- the Magistrate needs a transport to the</p> <p>18 hospital." And so that was it. But let me go back</p> <p>19 and so I can give you the full picture to ensure you</p> <p>20 got it.</p> <p>21 Captain Watkins contacted me after my use of</p> <p>22 force and said that Lieutenant Goolsby contacted him</p> <p>23 and said -- and Captain Watkins stated that he</p> <p>24 contacted Sheriff White. And he told me that I don't</p> <p>25 have -- that he made the Sheriff aware, and he said</p>
<p>171</p> <p>1 (proximal) part of the bone." Paragraph 3: "Apparent</p> <p>2 -- a fracture means the same thing as a 'broken bone.</p> <p>3 In general, fractures heal in about 6-8 weeks. Over</p> <p>4 time, the broken area gets stronger than the area</p> <p>5 around it." Did I read that correctly?</p> <p>6 A. I believe you did.</p> <p>7 Q. Does this document say that Ms. Oliver had a</p> <p>8 broken bone?</p> <p>9 A. It says she had a fracture to -- of the</p> <p>10 humerus. And it says that a fracture means the same</p> <p>11 thing, it's the equivalent as a broken bone.</p> <p>12 Q. Do you have any reason to dispute this</p> <p>13 document?</p> <p>14 A. No. This is between her and her medical</p> <p>15 official. I wasn't at the hospital.</p> <p>16 MR. CASTRO: Okay. We can remove the</p> <p>17 document.</p> <p>18 Q. (Mr. Castro) So after this incident</p> <p>19 happened and you went home or you got back in your</p> <p>20 vehicle, did you call anyone about what happened?</p> <p>21 A. Yes. I contacted -- I contacted Lieutenant</p> <p>22 Goolsby and possibly Welborn, but I do remember</p> <p>23 speaking to Goolsby.</p> <p>24 Q. Can you roughly remember what you said?</p> <p>25 A. I'm sorry, Counselor?</p>	<p>173</p> <p>1 that I don't have anything to worry about.</p> <p>2 He said, "I sit on the use of force</p> <p>3 committee." And he said, "Before it gets to the</p> <p>4 Sheriff, it has to get through me." And he said, "I</p> <p>5 got your back." He said, "You don't have to worry</p> <p>6 about anything because you did your job. You did what</p> <p>7 you were supposed to do, and had she not resisted,</p> <p>8 this wouldn't have happened."</p> <p>9 Q. Was this before the incident was</p> <p>10 investigated that he said that?</p> <p>11 A. Yes. And also on that phone call, Captain</p> <p>12 Watkins stated for me to do my incident report and u</p> <p>13 of force report and to leave a copy of there for Ray.</p> <p>14 And I said, "Leave a copy for Ray for what?"</p> <p>15 He said, "Leave a copy for Lieutenant Sharon</p> <p>16 because he's the person that handle these type of</p> <p>17 matters and he's going to be looking into -- he's</p> <p>18 going be reviewing," is what he said, "your</p> <p>19 paperwork." He said, "Just cover yourself." But he</p> <p>20 said, "You're going to be all right."</p> <p>21 Q. Who said that?</p> <p>22 A. Captain Watkins. Lloyd Q Watkins, Captain</p> <p>23 of Patrol.</p> <p>24 Q. Does Captain Watkins decide whether to fire</p> <p>25 you or not?</p>

<p>174</p> <p>1 A. Sheriff White makes the decision whether to 2 fire me. But Captain Watkins spontaneously uttered, 3 without me even asking, that he had talked to the 4 Sheriff. And he told me that the Sheriff was aware 5 and that I don't have anything to worry about. 6 Captain Watkins also said that he sit on the 7 use of force committee. He said, "Before it gets to 8 the Sheriff, it gets to go through us." And he said, 9 in the past, the Sheriff's always going with their 10 recommendation for the use of force committee, and 11 didn't have to worry about anything. 12 Q. Does the Sheriff have the authority to 13 overrule the committee? 14 A. Yes. I mean, he has the authority. But 15 here's the issue. Based on Captain Watkins verbal 16 testimony to me, the Sheriff did not overrule in times 17 past. He always went with the recommendation of the 18 use of force committee. 19 And Captain Watkins made it very clear that 20 I didn't have nothing to worried about. I wouldn't 21 have never known that he talked to the Sheriff outside 22 of Captain Watkins telling me. 23 Q. Does the Sheriff have to tell you if he's 24 investigating your employment? 25 A. Come again?</p>	<p>176</p> <p>1 things. 2 Q. Did you also call or have a call with 3 Sergeant Welborn? 4 A. I've said that I may have called Sergeant 5 Welborn, but I -- I know I remember calling 6 Sergeant -- excuse me, Lieutenant Goolsby. 7 Q. Do you remember if you asked Goolsby whether 8 you would -- might lose your job? 9 A. If it's not in the reports that you all 10 I have, then I'm not going to be able to say that I did 11 ask that. I don't recall that. 12 Q. Were you concerned that you might lose your 13 job? 14 A. Well, no. I was -- I was already told that 15 I was in the clear, so I didn't have nothing to worry 16 about. 17 Q. Before you were told you were in the clear, 18 were you concerned? 19 A. I wasn't concerned about losing my job 20 because I did my job. 21 Q. All right. So after the --- 22 A. However -- however, I had already been 23 threatened by Sheriff White at least three times that 24 if I didn't drop my complaints, that he was going to 25 fire me. My protected activity complaints, in which</p>
<p>175</p> <p>1 Q. Is the Sheriff obligated to tell you whether 2 he's investigating whether you should still be 3 employed, that he -- was he supposed to call you? 4 A. If I'm being -- if I'm being investigated, 5 then it would be appropriate for him to say, "Hey," 6 someone -- to one of his command staff members, let 7 the deputy for my case, Deputy White, know that 8 under investigation," or for him to tell me. 9 He don't have to tell me. They don't have 10 to tell me. I mean, if they don't want to do it, they 11 don't have to do it. But if they start doing these 12 investigations, these one-sided investigations in 13 which the County is known for, then it creates a 14 problem. 15 Because while I work at the pleasure of the 16 Sheriff, there are due process rights. There are 17 equal protection rights and there are First Amendment 18 rights when it comes to a government entity. 19 Q. You said the County's known for one-sided 20 investigations. What are you referring to? 21 A. The write-up initially, of where I got 22 suspended. The employee counseling form that is 23 predated six months approximately before I was even 24 hired, all both by Lieutenant Campbell. Also, the 25 shift -- the deceptive shift transfer, if not other</p>	<p>177</p> <p>1 he threatened to fire me in front of a third party. 2 Q. Who was the third party? 3 A. Bullock. 4 Q. You said this happened three times? 5 A. Yes. He -- Sheriff White threatened to fire 6 me three times. 7 Q. Do you know when these three times occurred, 8 what dates? 9 A. It's in my complaints. It's in the summer 10 of 2018, somewhere around June or July. I believe it 11 was July when he met with me. Somewhere around mid 12 late July, approximately, of 2018. And he wanted me 13 to drop my complaints and I told him I wasn't going to 14 do it, and he told me to drop them. 15 Q. Why did he want you to drop them? 16 A. He alleged that he don't know of any 17 discrimination, race discrimination and any other 18 protected activity violation that may have been in 19 that letter, in his department. 20 And he told me that I don't go to HR. He 21 don't -- I shouldn't go to HR because HR doesn't got 22 nothing to do with this, and he told me to drop my 23 complaints. And I told him, I said, "I'm not going to 24 drop them." 25 And he said, "If you don't drop them, I'm</p>

<p>178</p> <p>1 going to drop you. I am the elected sheriff." Then</p> <p>2 he slammed his hands on the desk, and I told him I</p> <p>3 wasn't going to drop it. And he said, "Why not? You</p> <p>4 have a career here if you want it. Just drop the</p> <p>5 complaints." And I said, "Well, I'm not going to drop</p> <p>6 them." And so he gave me a letter and I went back to</p> <p>7 work.</p> <p>8 Q. What letter did he give you?</p> <p>9 A. He gave me two letters, I believe, in</p> <p>10 response to my internal EEO Protected Activity, Title</p> <p>11 VII grievances.</p> <p>12 Q. Got you. Did anyone other than Bullock --</p> <p>13 and which Bullock are you referring to again?</p> <p>14 A. Bullock, Chief -- excuse me. Chief Bullock.</p> <p>15 Q. Did anyone other than Chief Bullock witness</p> <p>16 these events?</p> <p>17 A. It was just us in the office, so no.</p> <p>18 Q. This was done in Sheriff's White -- Sheriff</p> <p>19 White's office?</p> <p>20 A. Yes.</p> <p>21 Q. After October of 2018, did you ever speak to</p> <p>22 Ms. Oliver again?</p> <p>23 A. I don't believe so. After the use of force,</p> <p>24 no.</p> <p>25 Q. Have you received any e-mails, calls, texts</p>	<p>180</p> <p>1 He said, "Weldon talked to her," referring</p> <p>2 to Captain W. Bullock. "Lawrence talked to her,"</p> <p>3 referring to Chief Bullock. And I believe they said</p> <p>4 that Captain and Watkins were in there.</p> <p>5 But there was -- I believe there was a</p> <p>6 third --- a third party command staff member in there.</p> <p>7 And Lieutenant Goolsby told me that, "She came up here</p> <p>8 this morning and she said, 'If you all don't fire</p> <p>9 him,'" referring to me, that "I'm going to sue the</p> <p>10 Title County, the Sheriff and Deputy White."</p> <p>11 And the following day, I was terminated. So</p> <p>12 the agreement that they have in term -- in terms of</p> <p>13 terminating me would restrict her from suing me. And</p> <p>14 even if she did suing -- the immunity is going to</p> <p>15 prevent. I'm not concerned about it.</p> <p>16 Q. So you're contending that the day before you</p> <p>17 were fired, Ms. Oliver went into the Sheriff's Office</p> <p>18 and said, "If you don't fire him, I'm going to sue</p> <p>19 you"?</p> <p>20 A. I'm not -- I'm telling you exactly what</p> <p>21 Lieutenant James L. Goolsby told me as a witness to</p> <p>22 her conversations, with her being so loud and also</p> <p>23 with them talking to him after she left.</p> <p>24 And Lieutenant Goolsby let me know to be up</p> <p>25 there, it might have been somewhere between 12:00 a</p>
<p>179</p> <p>1 from her or her family?</p> <p>2 A. No.</p> <p>3 Q. Do you know whether Ms. Oliver plans to sue</p> <p>4 you over what happened?</p> <p>5 A. I don't have any ---</p> <p>6 Q. Without disclosing any attorney-client</p> <p>7 communications, of course.</p> <p>8 A. I'm sorry?</p> <p>9 Q. Without disclosing any attorney-client</p> <p>10 communications, of course. I don't want to know about</p> <p>11 that. Do you know if Ms. Oliver is going to sue you</p> <p>12 over what happened?</p> <p>13 A. Well, I'm not sure if she is going to change</p> <p>14 her mind about not suing me. First and foremost, I</p> <p>15 if she sued me, I will win because I have immunity</p> <p>16 public official immunity, public officer immunity, as</p> <p>17 well as other government immunities.</p> <p>18 And not only that, if she sued me, she will</p> <p>19 be going against the agreement that she had with the</p> <p>20 County and the Sheriff.</p> <p>21 And as I quote, as Lieutenant Goolsby called</p> <p>22 my phone that morning that I had to go in to meet</p> <p>23 allegedly the Sheriff, and it ended up being Captain</p> <p>24 Bullock, "Ms. Oliver was up here early this morning</p> <p>25 complaining on you. Everybody could hear her."</p>	<p>181</p> <p>1 2:00, to meet with the Sheriff. And when I got there,</p> <p>2 I had to wait nearly an hour, if not more than an</p> <p>3 hour, and I met with Captain Bullock.</p> <p>4 Q. And you were terminated the day after?</p> <p>5 A. Yes. At three o'clock.</p> <p>6 Q. And you are contending that those two are</p> <p>7 related, those two events are related?</p> <p>8 A. I'm -- what two events, contending what?</p> <p>9 Q. That your termination was related to Ms.</p> <p>10 Oliver threatening to sue?</p> <p>11 A. No. I'm just -- I'm laying out the facts</p> <p>12 that took place, okay? My termination I believe is</p> <p>13 related significantly to the retaliation -- the</p> <p>14 retaliatory conduct of your client in threatening to</p> <p>15 fire me because I would not withdrawal my protected</p> <p>16 activity complaints. And I'm also saying what</p> <p>17 Lieutenant Goolsby told me that Ms. Oliver said.</p> <p>18 Q. Got you. So why were you so adamant about</p> <p>19 serving the warrant on Ms. Oliver? You went to her</p> <p>20 house at 2:00 a.m. and then -- or around that time,</p> <p>21 and then you went to her house again? Can you ---</p> <p>22 A. As I answered -- as I answered before, I was</p> <p>23 told to go serve the warrant, okay? She was not the</p> <p>24 first person that I had to go serve a warrant on who</p> <p>25 wasn't there the first time, who wasn't there the</p>

<p>182</p> <p>1 second time and sometimes it required a third or 2 fourth visit.</p> <p>3 I mean, that happens in law enforcement. If 4 you go back, Counselor, to the write-up, when Campbell 5 talked about, "Deputy White says that he went to the 6 house and -- the houses and he attempted warrant 7 services, et cetera."</p> <p>8 I went to houses multiple times, okay? The 9 same house multiple times, other houses multiple 10 times. Nobody come to the door. Sometimes later 11 the third or fourth, sometimes fifth visit, somebody 12 home. Somebody car in the driveway. Somebody 13 the door, and you're able to either serve the warrant 14 or get the person to provide information for the 15 person to come to the Sheriff's Office.</p> <p>16 Or -- or sometimes, I mean, you just get the 17 person and you take them there. It's accomplished 18 the law enforcement objective. It's not about me 19 being obsessed with Ms. Oliver in terms of being 20 adamant.</p> <p>21 Q. Is it true that you weren't told to go serve 22 the warrant until you asked someone to help you serve 23 the warrant? Is that right?</p> <p>24 You said you were instructed to serve the 25 warrant, but your complaint says you asked for help</p>	<p>184</p> <p>1 the county and you have to serve warrants. 2 Misdemeanor warrants, felony warrants, child support 3 warrants, order for arrest, criminal summons. Take 4 somebody into custody and do a magistrate's order.</p> <p>5 So I can't say it wouldn't have -- it would 6 have been avoided, because she was adamant on not 7 going to jail. So who's the say that, had the traffic 8 issues not happened. Which, you know, caused me to 9 radio her plate in, that I or another deputy wouldn't 10 have had the same outcome with her since she didn't 11 want to go.</p> <p>12 Q. But it was your traffic stop that --- 13 A. And I will also say that your client -- not 14 your client. Ms. Oliver, upon information and belief, 15 her criminal record -- she has a criminal record. 16 She's been charged before. In terms of convictions, I 17 can't remember if she was convicted, but she 18 definitely had charges, not just for those two 19 warrants.</p> <p>20 Q. Why does that matter? 21 A. It's a -- it shows that she is a repeat 22 offender in terms of being charged and if she's not 23 been convicted.</p> <p>24 Q. So wasn't it your traffic stop that prompted 25 you to search for Ms. Oliver's warrants?</p>
<p>183</p> <p>1 from Sergeant Welborn. And then he stated, "You go 2 it." So is it true that you weren't instructed until 3 you actually asked him about it?</p> <p>4 A. I stand by my statement. I did ask him 5 about having a backup unit there to help me serve the 6 warrant. I believe in teamwork. They believe in 7 teamwork. Unfortunately, Sergeant Welborn decided 8 have me go up there and serve the warrant. That's 9 what I done.</p> <p>10 Q. Do you regret serving that warrant? 11 A. I don't regret doing my job. I don't regret 12 going to serve the warrant because I had a job to do. 13 I took an oath, just like every other deputy there. 14 Now, it's unfortunate that the circumstances took 15 place in terms of her arm getting fractured or broken. 16 But that was definitely not intentional, and 17 it could have been avoided had Ms. Oliver complied 18 with my lawful orders, lawful request. Had she 19 adhered to what I was trying to do, this situation 20 would have turned out so much better.</p> <p>21 Q. To your point, could this have been avoided 22 if you did not conduct a traffic stop on Ms. Oliver in 23 the first place?</p> <p>24 A. Well, I can't say it would have been 25 avoided, because every deputy is assigned to a side of</p>	<p>185</p> <p>1 A. As I previously explained, Counselor, and 2 it's the -- the 911 dispatcher came back very, very 3 quick despite Major Bullock saying that there's no 4 radio traffic showing that and there's no radio 5 the traffic showing anything other than me reading the 6 plate, and then later saying that there was a 7 distortion or distinction -- there was a mix-up in 8 what I was asking for and what the 911 Dispatcher 9 believed.</p> <p>10 Q. But you called --- 11 A. But the traffic -- the traffic violations is 12 what put me on to Ms. Oliver. And according to the 13 write-up that Campbell issued, or whatever 14 documentation issued, my -- one of my responsibilities 15 is preventing crime. And violations of Chapter 20, 16 that's a crime. So I was still doing my job.</p> <p>17 Q. But it was a traffic stop that put you on to 18 Ms. Oliver. Is that correct? 19 A. It was a traffic violation she committed, 20 multiple ones. And I never did a traffic stop, okay? 21 I did not pull her over. I followed her and I tried 22 to talk to her via the community-oriented policing 23 model, the philosophy.</p> <p>24 Q. Do you ever call people that have 25 outstanding warrants and tell them to come to the</p>

<p>1 Sheriff's Office to be served? 2 A. Yes, I have. 3 Q. Why didn't you do that with Ms. Oliver? 4 A. One, I was told by Sergeant Welborn to go 5 get her, and so I went to get her. 6 Q. That was after you had --- 7 A. And the most -- and then when I called, 8 she -- when I -- when I went to get her, I was going 9 based on a supervisory order. Whenever I called 10 somebody, it wasn't that I was actually -- actually 11 searching for their number, if we even had one, 12 because I didn't have a laptop. 13 But sometimes a number may have been -- a 14 number may have been on the warrant log. I forgot 15 what it's called, but whatever side you're on, north 16 or south, there's a warrant log. 17 If the number was up there and after 18 multiple attempts of us not -- of me not trying to -- 19 of not getting a person, then I would call. I would 20 see if I can find something to get in contact with 21 this person. 22 MR. CASTRO: Can we go off the record? 23 THE COURT REPORTER: We are off the 24 record. The time is 4:52. 25 (Brief recess: 4:52 p.m. to 5:24 p.m.)</p>	<p>186 1 was terminated, I spoke to Captain Watkins. I spoke 2 to Lieutenant Goolsby, Sergeant Welborn. I told 3 Poole, Deputy Poole, that I had a use of force. I 4 said Sergeant -- I said Sergeant Welborn. Deputy 5 Edwards. 6 Now, I can't remember off the top of my 7 head. I mean, I do know, you know, Captain Bullock, 8 you know, he questioned, being that he did some 9 questions -- had some questions for me. 10 Q. Did any of them tell you that you were about 11 to be terminated? 12 A. No. I didn't know that I was being -- going 13 to be fired until around 3:00 p.m. on the 24th, 14 when -- a few minutes before three o'clock, Captain 15 Watkins called me. And I was working part -- I was 16 working not part-time. Off -- off-duty at the 17 courthouse. He told me to come to his office. 18 And when I went in his office, I saw 19 Bullock -- Weldon Bullock, Lawrence Bullock, Ray 20 Sharon. Watkins was sitting in his office with the 21 door closed. When I -- no. 22 Watkins was sitting in his office. He saw 23 me. Either he was sitting down or he was standing up 24 near the door or something. And I went in his office, 25 and when I went to close it, I believe Captain Bullock</p>
<p>187 1 THE COURT REPORTER: We are back on the 2 record. The time is 5:24 p.m. 3 Q. (Mr. Castro) All right. Mr. White, we're 4 going to talk about what happened after the Ms. Oliver 5 incident with regard to your employment. You 6 mentioned that Captain Watkins spoke to you on the 7 phone about the incident. Is that right? 8 A. Yes. Captain Watkins spoke to me on the 9 phone on the night of my use of force. After that, 10 him and I did not speak at all, outside of him calling 11 me down to his office so they could terminate me. 12 After I left the Sheriff's Office, him and I had no 13 communication. 14 Q. What other colleagues did you talk to after 15 the incident? 16 A. What -- are you asking me what other 17 colleagues Captain Watkins talked to, or what other 18 colleagues I talked to? 19 Q. You talked to. 20 A. Well, I didn't have any colleagues after 21 they fired me. 22 Q. Well, from the time that the incident 23 occurred to the time you were fired, is what I'm 24 asking. I'm sorry. 25 A. From the time the incident occurred until I</p>	<p>188 1 and Lieutenant Sharon -- Captain Bullock said 2 something about, "I need to get in here." 3 And so I opened the door, and that's when he 4 said, Captain -- Captain Bullock said, "I need your 5 gun and badge and your credentials. Your services -- 6 the Sheriff told me to tell you that your services are 7 no longer needed, no longer required," something to 8 that effect. 9 So Lieutenant Sharon wanted to take my gun, 10 and he pulled like three or four times and he couldn't 11 get it out. And so he was like, "Well, I can't get it 12 out." And I told him, I said, "I'll pull it out." I 13 said, "I'm not going to do nothing other than pull it 14 out so you can get it." And that's what I done then. 15 And he took it, and he said, "Thanks, J. J." 16 And he gave me a ride home, and he told me, "I just 17 want to let you know, I -- I didn't have nothing to do 18 with that." He was like, "I -- I don't want you to be 19 mad at me or anything." So that was it. 20 Q. Who gave you the ride home? 21 A. As I just said, Lieutenant Sharon. 22 Q. And did you talk on your way home? 23 A. No. It was a quiet drive. 24 Q. Was Sheriff White present in the office when 25 you were told that you were being terminated?</p>

<p>190</p> <p>1 A. I don't know where he was.</p> <p>2 Q. Did they mention the Ms. Oliver incident?</p> <p>3 A. No. Nobody mentioned it. Everything I just</p> <p>4 told you, what Captain Bullock said -- Weldon Bullock</p> <p>5 "Sheriff told me to tell you your services are no</p> <p>6 longer needed" ---</p> <p>7 Q. That's it? You didn't ask questions ---</p> <p>8 A. --- credentials, badge, gun. They needed</p> <p>9 that, said somebody would give me a ride home in my</p> <p>10 patrol car, and that's what happened.</p> <p>11 Q. Did you ask, "Why is this happening?" or</p> <p>12 anything like that?</p> <p>13 A. Yes. I asked for a reason. He told me the</p> <p>14 Sheriff told him not to talk about it.</p> <p>15 Q. Who said that?</p> <p>16 A. Captain Bullock. Weldon Bullock, Weldon</p> <p>17 Wallace Bullock.</p> <p>18 Q. Did anyone at the Sheriff's Office use</p> <p>19 racial slurs or discriminatory language against you</p> <p>20 near the time of your termination?</p> <p>21 A. Yes, they did.</p> <p>22 Q. Who did?</p> <p>23 A. There were several deputies, such as Deputy</p> <p>24 Patel, a few months prior to my termination and said</p> <p>25 the N word. "What's up, N?" I observed him say</p>	<p>192</p> <p>1 Q. Can you give me some context? What did</p> <p>2 Bobby Martin say, when was he using it, against whom?</p> <p>3 A. He said -- well, he said it to me, mocking</p> <p>4 what Patel said as well as said it to Patel. And I</p> <p>5 told him that he shouldn't be saying that word. And</p> <p>6 of course he's like, you know, "Mr. White, I grew up</p> <p>7 with, you know, African-Americans and I got black</p> <p>8 people in my family."</p> <p>9 And he was like, "I never meant to</p> <p>10 disrespect you or anything." I said, "Okay." And</p> <p>11 Welborn used it in the context of a song that was</p> <p>12 composed by or performed by Lil Deval, L-I-L, D-U-</p> <p>13 L, "Smile." And one of his lyrics is, "I ain't going</p> <p>14 back and forth with you Ns. I'm living my best life,"</p> <p>15 et cetera.</p> <p>16 Q. Was he using it -- was he directing that</p> <p>17 term towards you or singing the song to you?</p> <p>18 A. He was singing the song and I was sitting in</p> <p>19 front of him. And I told him, I said, "Hey, man." I</p> <p>20 said, "You can't be saying that word." And I said --</p> <p>21 and he was like, "I can say that word, J.J. All I</p> <p>22 know is your kind. I grew up with your kind. I can</p> <p>23 say that word."</p> <p>24 Q. How did you respond?</p> <p>25 A. How did who respond?</p>
<p>191</p> <p>1 "What's up, N" to Deputy Poole.</p> <p>2 I told him he should not be saying that word</p> <p>3 in the workplace, and he said that, "I'm nearly just</p> <p>4 as black as you," or something to that effect, "and I</p> <p>5 can say that word."</p> <p>6 Q. How did Deputy Poole react?</p> <p>7 A. Who?</p> <p>8 Q. You said he said it to Deputy Poole as well.</p> <p>9 Do you know how he reacted?</p> <p>10 A. He don't like the word either, but I can't</p> <p>11 testify on his behalf.</p> <p>12 Q. Did you see what -- did you see how Deputy</p> <p>13 Poole responded, did he say anything?</p> <p>14 A. I said -- I just answered that question. I</p> <p>15 said that he did not like the uses of the word.</p> <p>16 Q. Other than Mr. Patel, did any other people</p> <p>17 use discriminatory language against you, prior or at</p> <p>18 or near the time of your termination?</p> <p>19 A. Well, yes.</p> <p>20 Q. Who else?</p> <p>21 A. There was a few sergeants that said some</p> <p>22 things, some racial epithets, N word.</p> <p>23 Q. Who said the N word?</p> <p>24 A. Sergeant Bobby Martin, who was a white male,</p> <p>25 and Sergeant Chris Welborn, who was a white male</p>	<p>193</p> <p>1 Q. When he said, "I can say that word," what</p> <p>2 did you say?</p> <p>3 A. I told, I said, "No." I said, "That word</p> <p>4 shouldn't be said by anybody." I said, "Especially in</p> <p>5 the workplace."</p> <p>6 Q. Do you know when this was, around what time,</p> <p>7 what date?</p> <p>8 A. It was around the summer of -- 2018.</p> <p>9 Q. Can you approximate a month, or you just --</p> <p>10 summer is as specific as you can get?</p> <p>11 A. I'm going to just say summer.</p> <p>12 Q. So you mentioned that Bobby Martin used the</p> <p>13 N word without, of course, using the word. Can you</p> <p>14 tell me what the sentence was?</p> <p>15 A. As I already asked -- as I already answered,</p> <p>16 he was like -- he said something to the effect,</p> <p>17 "What's up, N," mocking Patel. That's what I just</p> <p>18 said. He said the same thing that Patel said. That's</p> <p>19 what I mean by that.</p> <p>20 Q. So was he talking to you?</p> <p>21 A. Yes. And he was also saying it and talking</p> <p>22 to Patel.</p> <p>23 Q. And he said he didn't mean to disrespect</p> <p>24 you. Did you believe that?</p> <p>25 A. I took them at his word, but he shouldn't --</p>

<p style="text-align: right;">194</p> <p>1 he knew better. Don't -- listen. No African-American 2 wants to hear a Caucasian-American say the N word. 3 Let's be clear. Let's not play dumb. 4 Q. Was this the first time that Bobby Martin 5 had used this word in front of you? 6 A. To my knowledge. I don't have any 7 recollection earlier now that -- I mean, I don't have 8 any recollection that it occurred earlier, while 9 sitting here now. 10 Q. How about Welborn? Was this using it with 11 the song, was that the only time you can recollect? 12 A. Yes. 13 Q. Okay. So you've mentioned that Mr. Patel, 14 Martin and Welborn. Anyone else use discriminatory 15 language at or near your termination? 16 A. Well, there were comments about -- I said 17 something to Sergeant Martin, who referred to Deputy 18 Purav, P-R -- P-U-R-A-V, Patel, P-A-T-E-L. He called 19 him Osama Bin Laden, and I told him that he could 20 make those terroristic threats, that it was 21 disrespectful, unprofessional, et cetera. 22 As far as the specific things that were 23 said, I'm not able to recall because it's been a long 24 time ago. But I covered basically most of it, if not 25 all of it in my -- the EEOC file and in my complaint.</p>	<p style="text-align: right;">196</p> <p>1n 2018, up until April and May. 2. To the point of where -- at least May, to 3 the point of where Sergeant Welborn said that he had 4 written Deputy -- and I can't think of her name. It's 5 on the tip of my tongue. He -- but it was a female 6 deputy. I can't pronounce her first name. I think it 7 starts with a Q maybe. 8 But he had written her up several times. He 9 had complained on her several times. And he said wh 10 he did it, the Chief Deputy, Lawrence Bullock, told 11 Lieutenant Goolsby not to do anything with it and tha 12 the Sheriff won't going to do anything with it. 13 And I asked Welborn why, and he said -- the 14 Chief Deputy said, "We don't have a lot of female 15 officers and we want to keep her. We don't want to 16 run her away." 17 And so they never disciplined her over what 18 Welborn said. Some of it deserved a suspension, and 19 not all of it combined, she could have been fired. Now, I 20 can't recall the specific, at this time, charges he 21 made, but there were several. 22 So if Chief Bullock and the Sheriff want to 23 discipline me for these false allegations, why not 24 investigate and discipline the female deputy in 25 question for what Welborn determined was true</p>
<p style="text-align: right;">195</p> <p>1 So I will say, refer to that. 2 Q. Did Sheriff Peter White ever use 3 discriminatory language against you? 4 A. Not -- I can't recall the specific language 5 if he may have used it, but I can say that the 6 behaviors of his office was discriminatory. 7 Q. What about him individually? 8 A. I -- I just answered that. 9 Q. Did he ever make fun of you for your race or 10 gender? 11 A. No. He didn't make fun, whatever that 12 means. 13 Q. To use offensive language or use it in a 14 joking manner. Did that ever happen? 15 A. No. He didn't directly do it. Not to my 16 knowledge. 17 Q. How about Lawrence D. Bullock? 18 A. How about? 19 Q. Did Lawrence D. Bullock ever used 20 discriminatory language or act discriminatorily 21 against you for your race or gender? 22 A. Well, I can say, in terms of the gender, I 23 remember an African-American female deputy who 24 allegedly, according to Sergeant C.M. Welborn, 25 violated multiple policies in -- late 2017 and early</p>	<p style="text-align: right;">197</p> <p>1 allegations or substantial allegations if, you know -- 2 and the only thing that was different between her and 3 I was our gender. She's a female. I'm a male. So to 4 answer your question about Chief Bullock, yes. 5 Q. Anything else about Chief Bullock that you 6 can remember? 7 A. I remember he told me that the Sheriff 8 wanted to fire me for what Cameron had written up, I 9 he talked him out of it. He told me if I appealed it 10 that the Sheriff would fire me. He later rescinded 11 that allegation, saying "would," in July when him and 12 the Sheriff met with me, and said that he never said I 13 would be fired. He said I could be fired. 14 Would, could, however you want to say it. 15 As I said, he said that I would be fired if I appealed 16 it, if I went to the Sheriff, and told me to sign it 17 and -- sign the form or whatnot. 18 Q. Which form is this? Just a --- 19 A. Write-up. 20 Q. Which write-up was this about? 21 A. The only one that I have, the written 22 warning that the -- the suspension, the falsification, 23 the falsiticity, the deceptive write-up by Lieutenant 24 Durwood Campbell. 25 Q. Okay.</p>

<p>198</p> <p>1 A. And if there's anything else that Chief 2 Bullock may have done, it's not coming to my head at 3 this time, but I think I covered a good portion of it. 4 Q. All right. That's great. How about Weldon 5 Wallace Bullock? Any discriminatory actions or 6 language taken against you? 7 A. I can't say that -- I can't say that he did 8 anything directly, but I want to be clear. This is 9 about, even before I filed any type of internal 10 grievances, EEO protective grievances, your client 11 I filed other complaints well before it went to HR 12 because of the deceptive shift transfer, okay? 13 Had -- had your client not did what they did 14 it and terms of the statements they made about me like 15 -- the purple hat being in my mailbox. Had all this 16 stuff as well as other things not took place, then it 17 would've never triggered to something on and on and 18 onward, up into write-ups, suspensions, bad 19 performance evaluations, et cetera. 20 Q. But going back to Mr. Weldon Bullock, you 21 said that you can't say anything directly. How about 22 indirectly discriminatory? 23 A. I don't have anything to say. 24 Q. Okay. Let's talk about this purple hat. 25 Where was your mailbox located?</p>	<p>200</p> <p>1 you know, like a toboggan or something. 2 Q. Something more for the winter? 3 A. Yes. 4 Q. Okay. All right. So after you were 5 terminated and you returned all your equipment, what 6 did you do after that, what happened next? Did you 7 call anyone? 8 Of course, without discussing calling your 9 attorneys or anything like that, did you call any 10 non-attorneys about it? 11 A. Yes. I called Poole and I told him what 12 happened. 13 Q. What did he say about it? 14 A. He was like, "What?" And I mean -- I mean, 15 you know, he wanted to know what happened. And I 16 told him, I said, "I just called to let you know they 17 wouldn't -- they fired me for whatever reason. I 18 don't know the reason." 19 And he told me it shouldn't be hard to find 20 out. But I told him what happened. You know, 21 Weldon -- Watkins called me down there, walked into 22 his office. Weldon came behind me, told me the 23 Sheriff don't need -- want my services, and they gave 24 me a ride home in my patrol car. 25 Q. Did you call the Sheriff to ask why you were</p>
<p>199</p> <p>1 A. In the hallway adjacent from -- on the 2 outside of the patrol room. 3 Q. Who has access to that hallway? 4 A. Everybody at the Sheriff's Office, sworn and 5 non-sworn personnel. 6 Q. Does anyone who's not a deputy or above have 7 access to those mailboxes? 8 A. Sworn and non-sworn, secretaries, personal 9 assistants, they have access to it. 10 Q. Does anyone that's not an employee of the 11 Sheriff's Office have access to those hallways? 12 A. Well, the janitors and the custodians. I 13 mean, they walk past it when they clean up. 14 Q. Anyone else? 15 A. No. Not to my knowledge. 16 Q. Can you describe this hat other than it 17 being purple? Did it have any symbols on it or 18 anything? 19 A. Again, I -- listen, it was a purple hat. It 20 had multi-colors in it -- in the fabric, an overall 21 purple hat, and it may have had a snowball puff at the 22 top. I don't -- I can't remember everything. 23 Q. So when you say, "hat," you're not talking 24 about a baseball cap? 25 A. No. I'm talking about, like, a snow cap or,</p>	<p>201</p> <p>1 terminated? 2 A. No. 3 Q. Why not? 4 A. Why would I? If he wanted me to know why I 5 was terminated, he would have -- he would not have 6 told Weldon not to talk to me, not to tell me why. 7 Q. Did Poole mention that your race played a 8 factor in your termination during your call? 9 A. No. And that call has been a long time ago 10 as well. 11 Q. Did anyone from the Vance County Sheriff's 12 Office mention that race was a factor? 13 A. No. They denied it. They denied race when 14 I filed my -- after I filed my complaints. 15 Q. Did they mention gender was a factor? 16 A. No. 17 Q. Did they mention sexual orientation as a 18 factor? 19 A. No. 20 Q. Other than Poole, did you call anyone else 21 saying, "I got fired. I don't know what happened"? 22 A. Yes, I called Poole. I later called -- I 23 called Welborn. I was like, "You know I got fired?" 24 and he was like, "No. I didn't know," X, Y and Z, and 25 it was a short call. That's a long time ago. I can't</p>

<p>202</p> <p>1 remember everybody that I spoke to, but anybody 2 spoke to would've been very, very limited because 3 a private person. 4 Q. So while you were -- when you started 5 working at the Vance County Sheriff's Office, is it 6 true that you would sometimes carry around a notebook 7 while you were on duty? 8 A. Yes. I was provided that notebook. 9 Q. Who provided you that notebook? 10 A. I believe either Campbell or Wayne gave me 11 that notebook. 12 Q. Can you describe the notebook? How did it 13 appear? 14 A. In the where? 15 Q. How large was it, what color was it? 16 A. It was either square or rectangular. I 17 can't remember the exact color. 18 Q. Did it just have blank pages on the inside? 19 A. It had had sheet paper on the inside. 20 Q. What would you write down in that notebook? 21 A. That was used for working purposes. Working 22 purposes. When I went to a call, when -- if I had to 23 get some information, do an incident report, 24 operations report, if I had to do an investigation. 25 Q. So was it ---</p>	<p>204</p> <p>11 know where the notebook is. 12 Q. Okay. So can you explain how your 13 employment at the Vance County Sheriff's Office caused 14 you to suffer emotional distress? 15 A. This was a very -- this was a serious matter 16 that affected my livelihood, that affected my working 17 ability as a law enforcement officer as well as my law 18 enforcement certification, being jobless for at least 19 six months. 20 Later not, you know, being able to work in 21 law enforcement because your client gave negative 22 references, alleged, and marked my F5A, report of 23 separation as an internal investigation. And 24 basically did everything they could to prevent me from 25 working in law enforcement again, so it was very emotional. MR. CASTRO: Can we please pull up Exhibit 25? (DEPOSITION EXHIBIT NUMBER 25 WAS MARKED FOR IDENTIFICATION) Q. (Mr. Castro) And I will ask Mr. White to review it and describe it? A. Okay. That's my report of separation, 5A. Q. What does it say in that block at the top?</p>
<p>203</p> <p>1 A. It was not used -- it was not used for 2 personal notes. 3 Q. Was it used to note things regarding your 4 employment? 5 A. It was used for my job purposes, as I just 6 said. 7 Q. So would you write down things in your 8 notebook that offended you? 9 A. Like I said, I used that workbook for work 10 purposes. I do not remember writing anything down 11 about what may have happened with, like, a person like 12 matter or something like that. My notebook was used 13 for, like, enforcing the laws of this State. 14 Q. Did you ever write anything in there about 15 racism towards you or others? 16 A. Like I said, I -- I do not believe that I 17 used that notebook, wherever it may be, to write down 18 anything about that. That workbook was used for the 19 enforcement of the criminal laws of North Carolina and 20 Vance County. 21 Q. Where is the notebook? 22 A. I have no idea. Like I said, I moved 23 several times. I don't know where the notebook is 24 Q. Have you looked for it? 25 A. Yes. I've looked for things and I don't</p>	<p>205</p> <p>1 A. "Report of Separation, Form 5A, Deputy 2 Sheriff." 3 Q. Is there an A anywhere there? I see F5, 4 what do you see? 5 A. F -- F5. 6 Q. Where in here does it say anything 7 untruthful? 8 A. Well, first and foremost, the Social 9 Security Number is wrong. That's untruthful. 10 Q. Anything else? 11 A. And I don't believe -- okay. Okay, wow. 12 Then it says, "Signature on file," whatever that 13 means. 14 Q. Anything else here untruthful? 15 A. I don't see anything that stands out. 16 Q. It asks a question, "Was this separation a 17 result of a criminal investigation or violation of 18 the commission rules?" And the check is on, "No." Is 19 that accurate? 20 A. To the best of my knowledge. 21 Q. It then asks, "Are you aware of any ongoing 22 or substantiated internal investigations regarding 23 this officer within the last 18 months?" And it says 24 "Yes." Were there ongoing or substantiated internal 25 investigations regarding your employment ---</p>

<p>206</p> <p>1 A. First and foremost, I did not know that</p> <p>2 there was an ongoing internal investigation for my</p> <p>3 of force in terms of a substantiated use of force.</p> <p>4 And that was the only thing that your client said</p> <p>5 was -- that I was, you know, effectively terminated</p> <p>6 for, the -- the excess of force, violating the -- the</p> <p>7 policy, B91 or B9I.</p> <p>8 Q. Right. Well, Mr. White, Sheriff White</p> <p>9 submitted this document, so he is answering that he is</p> <p>10 aware of any ongoing or substantiated internal</p> <p>11 investigation. Was there an investigation into what</p> <p>12 happened with Ms. Oliver, yes or no?</p> <p>13 A. I -- I assume there was, despite me --</p> <p>14 despite upper management saying that I would be</p> <p>15 cleared, and that turned out to be false.</p> <p>16 Q. So regardless of what happened with the</p> <p>17 investigation or whether you believe it was done</p> <p>18 justly, is it accurate that there was an ongoing or</p> <p>19 substantiated internal investigation regarding your</p> <p>20 employment?</p> <p>21 A. I don't know what took place with that</p> <p>22 internal investigation. It was most certainly done</p> <p>23 not thorough. I don't even -- I don't even know if</p> <p>24 you can call it an internal investigation because</p> <p>25 there is no date that I remember -- that I remember</p>	<p>208</p> <p>1 All they had to do was do -- have a</p> <p>2 uncertified internal affairs investigator investigate,</p> <p>3 okay? Instead of deciding, "We're going to do a 24-</p> <p>4 hour -- less than 24-hour investigation and we're</p> <p>5 going to fire him."</p> <p>6 Q. But if there was an investigation, would it</p> <p>7 be proper for the Sheriff to say no and lie about an</p> <p>8 investigation on the F5 form?</p> <p>9 A. I don't know. You -- that's a question for</p> <p>10 your -- your client. I don't know his state of mind.</p> <p>11 Q. What is your opinion?</p> <p>12 A. Of what?</p> <p>13 Q. You're saying that it hurt your employment</p> <p>14 chances that he said that there was an investigation</p> <p>15 going on in this form. Should he have said there was</p> <p>16 not one?</p> <p>17 A. I don't know what -- he answered it based on</p> <p>18 how he wanted it done, all right? He said that there</p> <p>19 was a -- they alleged based on the IA report that it</p> <p>20 was substantiated, so he was right to check "yes."</p> <p>21 But I have no confidence in that</p> <p>22 investigation and everything that took place,</p> <p>23 especially because there was no fairness and I was</p> <p>24 threatened with dismissal at least three times if I</p> <p>25 didn't drop my EEO complaints.</p>
<p>207</p> <p>1 seeing on the internal investigation file. So who</p> <p>2 knows when it was done?</p> <p>3 Q. Do you think it was done within the last 18</p> <p>4 months?</p> <p>5 A. It could have been. It could have been, but</p> <p>6 there is no date on the IA file.</p> <p>7 Q. How long were you employed at the Sheriff's</p> <p>8 Office?</p> <p>9 A. Approximately a year and a half.</p> <p>10 Q. Was it more or less than 18 months?</p> <p>11 A. It was -- I believe I was employed like 16,</p> <p>12 17 months at Vance County.</p> <p>13 Q. And to your recollection, when did the</p> <p>14 Oliver incident occur?</p> <p>15 A. In -- around October 22nd, 23rd. October</p> <p>16 22, 2018, somewhere around there.</p> <p>17 Q. And the date on this document is October</p> <p>18 25th, 2018. So again, I'm asking you, other than the</p> <p>19 Social Security Number and the signature on file, what</p> <p>20 is not accurate about this F5 form?</p> <p>21 A. I don't see anything that's inaccurate, but</p> <p>22 most certainly, he should have known that checking</p> <p>23 something like this, whether they false allegations,</p> <p>24 confirmed allegations, substantiated internal affairs</p> <p>25 investigations, that that would hurt my prospects.</p>	<p>209</p> <p>1 MR. CASTRO: All right. We can remove</p> <p>2 this from the screen.</p> <p>3 Q. (Mr. Castro) I want to talk about your</p> <p>4 attempts to secure employment after you were</p> <p>5 terminated. Did you send a release to the Sheriff</p> <p>6 Standard Commission allowing them to view your</p> <p>7 employment documents?</p> <p>8 A. What relief -- what release are you talking</p> <p>9 about?</p> <p>10 Q. Let's pull up Exhibit 20.</p> <p>11 (DEPOSITION EXHIBIT</p> <p>12 NUMBER 20 WAS MARKED</p> <p>13 FOR IDENTIFICATION)</p> <p>14 Q. (Mr. Castro) And this is a collection of</p> <p>15 doc ---</p> <p>16 (Off-record comment)</p> <p>17 A. Okay.</p> <p>18 Q. So we'll start with the first page. What is</p> <p>19 this document?</p> <p>20 A. It's been a long time ago. It's</p> <p>21 authorization to release information.</p> <p>22 Q. Why did you sign this?</p> <p>23 A. It may have been for a job.</p> <p>24 Q. Is that your signature?</p> <p>25 A. Yes.</p>

<p>210</p> <p>1 Q. Does it say that you were allowing this</p> <p>2 recruiter to obtain your information?</p> <p>3 A. Yes.</p> <p>4 MS. ROBINSON: Brian, can you give him</p> <p>5 a moment to review this document?</p> <p>6 MR. CASTRO: Yes.</p> <p>7 (Witness examines document)</p> <p>8 Q. (Mr. Castro) Have you reviewed it?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Let's go to the second page, the next</p> <p>11 page.</p> <p>12 A. Yes.</p> <p>13 Q. What is this? I'll give you time to review</p> <p>14 it.</p> <p>15 A. I know what it is.</p> <p>16 Q. What is it?</p> <p>17 A. It's a Release of Personnel File that my</p> <p>18 lawyer drew up that you all did not honor.</p> <p>19 Q. What was the purpose of this release?</p> <p>20 A. To get my personnel file from Vance County</p> <p>21 Q. Do you need more time to review this before</p> <p>22 we go on?</p> <p>23 A. We can move on.</p> <p>24 Q. All right. Let's go to the next page. Do</p> <p>25 you recognize this document?</p>	<p>212</p> <p>1 believe company -- yeah, company police. So I was</p> <p>2 being -- vetted for -- as a company police officer, by</p> <p>3 North Carolina Special Police, LLC.</p> <p>4 Q. Does this release apply to your personnel</p> <p>5 file at the Sheriff's Office?</p> <p>6 A. I assume it would -- it would apply anywhere</p> <p>7 I worked at in law enforcement.</p> <p>8 Q. Did you sign these releases for the purposes</p> <p>9 of obtaining employment?</p> <p>10 A. I didn't have a choice. If I didn't sign</p> <p>11 the release, they weren't going to move forward with</p> <p>12 me.</p> <p>13 Q. So if one of these parties were using this</p> <p>14 release to get your information, were they doing</p> <p>15 anything wrong?</p> <p>16 A. If it had not been for employment, I would</p> <p>17 never have signed the -- the release forms, the</p> <p>18 authorization. But if I didn't sign them, I wouldn't</p> <p>19 be able to move forward in the hiring process. Now,</p> <p>20 I'm not saying that they're doing anything malicious,</p> <p>21 but I'm definitely not going to let Vance County</p> <p>22 sign -- hide behind a release form.</p> <p>23 Q. So if a potential employer showed Vance</p> <p>24 County Sheriff the release form and he released your</p> <p>25 personnel file, is he doing anything wrong?</p>
<p>211</p> <p>1 A. Yes. That is a release form from Durham</p> <p>2 County Sheriff's Office.</p> <p>3 Q. What is the date of this document?</p> <p>4 A. It appears either the 13th or the 5th -- the</p> <p>5 15th of March, 2019.</p> <p>6 Q. Why did you sign this release form?</p> <p>7 A. Because I was being vetted by Durham County</p> <p>8 Sheriff's Office.</p> <p>9 Q. Did you give them permission to look at your</p> <p>10 Vance County personnel file?</p> <p>11 A. Well, yes. That's -- it's just me signing a</p> <p>12 release form about the -- them authorized to talk to</p> <p>13 them.</p> <p>14 Q. Let's go to the next page. And this</p> <p>15 consists of two pages.</p> <p>16 A. Okay.</p> <p>17 Q. I'll give you time to review.</p> <p>18 (Witness examines document)</p> <p>19 A. You can go ahead with your question.</p> <p>20 Q. What was -- what is this document?</p> <p>21 A. It's a -- Authorization for Release of</p> <p>22 Records.</p> <p>23 Q. Why did you sign it?</p> <p>24 A. Because it was a requirement that it be</p> <p>25 signed for -- and if you would scroll down, for I</p>	<p>213</p> <p>1 A. No. They're -- I can't say they're doing</p> <p>2 anything wrong, but in terms of releasing a file,</p> <p>3 that's not something that a agency does. When -- whe</p> <p>4 an employer is looking for -- looking at an applicant</p> <p>5 to hire, they will go to that employer, review the</p> <p>6 file. No reasonable employer sends a file out -- make</p> <p>7 copies and sends a file out. Most of the time,</p> <p>8 somebody goes there.</p> <p>9 Q. Did you -- do you think these employers</p> <p>10 wanted to see what happened before you were terminate</p> <p>11 at Vance County Sheriff's Office?</p> <p>12 A. Yes. Every last one of them told me that</p> <p>13 they needed to know what took place involving my us</p> <p>14 of force. They said because that's a investigation.</p> <p>15 It was a -- an open-eye investigation. They would</p> <p>16 have to look at what took place.</p> <p>17 Q. So you disclosed that -- did you disclose</p> <p>18 what led to your termination?</p> <p>19 A. When you say "disclosed," what are you</p> <p>20 talking about? Telling them that -- what happened?</p> <p>21 Q. Yes.</p> <p>22 A. Yes.</p> <p>23 Q. What did you tell them?</p> <p>24 A. That there was an allegation of excessive</p> <p>25 force by a female who assaulted me, resisted,</p>

<p style="text-align: right;">214</p> <p>1 aggressive, attacked me, et cetera. She had warrants 2 for her arrest. Unfortunately, I had to do a arm bar 3 -- straight arm bar takedown and her arm got broken. 4 And after that -- shortly after that, they called me 5 in the office and told me that my services are no 6 longer needed. 7 Q. Based on what you told them, do you think it 8 was proper for them to request your personnel file? 9 A. Well, that's up for them to make that 10 decision. I know that they're going to want to know 11 what happened with the excessive force, so any 12 reasonable Internal Affairs investigator or -- or 13 manager of a -- or executive of a Police Department 14 going to want to know what took place. 15 Q. Is that why you signed those releases that 16 we just went through? 17 A. I had to sign them, as I previously answered 18 your question, that same question at least two or 19 three times. I had to sign them as matter of seeking 20 employment. And getting certified, I'm going to add 21 that, again with the State. If I didn't sign the 22 forms, I couldn't get hired and I couldn't get my 23 certification. 24 Q. So when you applied for employment after you 25 left the Vance County Sheriff's Office, did you</p>	<p style="text-align: right;">216</p> <p>1 not here. So if it goes too deep, that will be 2 something that you have to reach out to him about. 3 But the reason -- and that's publicly 4 available as well. The reason that they gave is 5 because I filed a discrimination and retaliation 6 lawsuit against Vance County Sheriff's Office, and 7 that they weren't going to keep somebody employed or 8 hire somebody who has sued a law enforcement 9 department, or they could've said law enforcement 10 agency. And they also said that the State don't like 11 it either. 12 Q. All right. Did they mention the excessive 13 force allegations of the Vance County Sheriff's 14 Office? 15 A. Yes. That was -- well, in that phone call 16 or documentation, no. But it was definitely came up 17 after I was told that I had nothing to worry about, 18 that I was good to go with the job shortly afterwards. 19 They said something about Captain Bullock 20 wrote something about excessive force and I broke an 21 arm, amongst other things that I can't remember off 22 the top of my head. 23 Q. Okay. So I want to talk about the specific 24 allegations and hope to be wrapping up soon. If we 25 can go to Exhibit 3, which is the amended complaint.</p>
<p style="text-align: right;">215</p> <p>1 disclose your previous lawsuits and EEOC charges? 2 A. I don't believe any employer asked for it. 3 And if they did, it's not off the top of my head. 4 Q. Do you know what they --- 5 A. So I'm going to say that I did not. I did 6 not disclose that information because it's protected 7 activity, and not only that, I don't believe any 8 employer asked for it. 9 Q. Do you know if any of your lawsuits are 10 publicly available in court records? 11 A. Well, yes. It's publicly available on 12 PACER. 13 Q. Did you disclose other terminations other 14 than the Vance County Sheriff's Office termination? 15 A. Well, yes. It's required for an F3. 16 Q. So let's talk about the NC Special Police, 17 LLC specifically. 18 A. Yes. 19 Q. Did they give you the reason that they did 20 not offer you employment or that they rescinded an 21 offer? 22 A. Yes, they gave a reason. 23 Q. What was their stated reason? 24 A. And I just want to say this for the record. 25 My Counselor who is representing me on this matter</p>	<p style="text-align: right;">217</p> <p>1 And if we can go to Allegation 52, which is on Page 2 13. Can you review that allegation? 3 (Witness complies) 4 A. "Deputy Green commented that Lieutenant 5 Campbell's respectful, cool and calm to whites but 6 rude and nasty to blacks" --- 7 Q. When did --- 8 A. --- just like me. 9 Q. When was this statement made, this comment 10 made? 11 A. I will say somewhere around maybe -- maybe 12 November, when I got transferred to Marin's shift. 13 And let me just say that. Earlier I said something 14 about, there may have been some other people on the 15 shift. Deputy Green was one of the new hires that 16 came in and he was also on Marin's shift. And at that 17 time, he was riding with Marin, doing some field 18 training. 19 Q. Did he provide you with any examples of 20 Lieutenant Campbell being rude and nasty to people of 21 a certain race? 22 A. Yeah. He said that he rode with Campbell a 23 few times and every time it came to a black person, 24 Campbell was nasty, unprofessional, wanting to get 25 with them, but when it came to a white person, he was</p>

<p>218</p> <p>1 respectful. He didn't want to do nothing with it.</p> <p>2 And then further, Green was going to have to be called</p> <p>3 as a witness.</p> <p>4 Q. Do you plan to call him as a witness?</p> <p>5 A. I don't know what my lawyers plan to do.</p> <p>6 That would be a question for them, Counselor.</p> <p>7 Q. All right. Let's look at Allegation 69.</p> <p>8 And if you -- if we look at Subsection C, it says,</p> <p>9 referring to Sergeant Roberson and Sergeant Alexander,</p> <p>10 "Both Sergeants praised Mr. White's performance" in</p> <p>11 January of 2018. Can you describe how they praised</p> <p>12 your performance?</p> <p>13 A. True statement. As I described earlier,</p> <p>14 that Sergeant Roberson told me that I was a good</p> <p>15 deputy, that I come to work, that I do my job. That</p> <p>16 he had no issues with my personal performance or</p> <p>17 performance -- personal conduct or work performance.</p> <p>18 I asked the same questions to Sergeant</p> <p>19 Alexander and he confirmed that he had no issues</p> <p>20 either outside of that one incident that I was cleared</p> <p>21 for, and so that's what I'm talking about.</p> <p>22 Q. Moving to Allegation 84 on Page 17, it says,</p> <p>23 "Mr. White understood Sheriff White's instruction to</p> <p>24 issue criminal citations to Mexican-Hispanic persons</p> <p>25 Did Sheriff White tell you to issue criminal</p>	<p>220</p> <p>1 that they don't have a problem with, you know,</p> <p>2 deputies getting minorities, per se. But when it</p> <p>3 comes to a Caucasian-Americans, we had to be careful</p> <p>4 There is no other reason. I mean, the</p> <p>5 example speaks for itself. In my opinion, why not</p> <p>6 ticket the white woman who committed more gross</p> <p>7 violations, okay under Chapter 20. But yet you want</p> <p>8 to ticket a Mexican and Hispanic male who didn't</p> <p>9 deserve to be ticketed.</p> <p>10 Q. Moving on to Paragraph 110 on Page 21. It</p> <p>11 states, "Mr. White later learned that the increase in</p> <p>12 hostility towards him was created by Sheriff White.</p> <p>13 After Mr. White filed his internal complaints and EEOC</p> <p>14 charge, Sheriff White held a conference with</p> <p>15 leadership, deputies and staff members and informed</p> <p>16 World of Mr. White's complaints and instructed them not</p> <p>17 to speak around Mr. White."</p> <p>18 When did this conference happen?</p> <p>19 A. That is a true statement confirmed by --</p> <p>20 told to me by Sergeant Welborn and Sergeant Bobby</p> <p>21 Martin, as well as Lieutenant Goolsby and Captain</p> <p>22 Watkins. And it was also told to me by Deputy Poole</p> <p>23 because he heard it.</p> <p>24 So that is a true statement. In fact,</p> <p>25 Captain Watkins told me to watch my back. He said,</p>
<p>219</p> <p>1 citations to Mexican-Hispanic persons?</p> <p>2 A. In fact, when he told me to issue that</p> <p>3 ticket to the Hispanic, when I as the responding</p> <p>4 officer -- determined that he had not done anything</p> <p>5 and didn't deserve a ticket, that's exactly what he</p> <p>6 done. Because you ---</p> <p>7 Q. But did ---</p> <p>8 A. Excuse me?</p> <p>9 Q. But did he tell you, "You need to issue</p> <p>10 criminal citations to Mexican and Hispanic people"?</p> <p>11 A. He didn't say those specific words.</p> <p>12 Q. Okay. And it says, "Lieutenant Campbell's</p> <p>13 instruction not to issue criminal citations to white</p> <p>14 persons."</p> <p>15 Did he instruct you not to issue criminal</p> <p>16 citations to white persons?</p> <p>17 A. He didn't say those specific words, but most</p> <p>18 certainly his actions of me giving a -- of management</p> <p>19 allowing me to give a Hispanic man traffic summons</p> <p>20 then not allowing me to give a white woman traffic</p> <p>21 summons, something's wrong with that picture. And</p> <p>22 believe it's -- it's discriminatory.</p> <p>23 Q. And did you understand that to be them</p> <p>24 instructing you to target a specific race?</p> <p>25 A. I understood them to be telling me to get --</p>	<p>221</p> <p>1 "Bro, watch your back." In fact, in front of multiple</p> <p>2 deputies, Sergeant -- Sergeant Bobby Martin told me in</p> <p>3 front of multiple deputies that the command staff had</p> <p>4 the meeting and that Sheriff White said those things</p> <p>5 that you just wrote and directed Goolsby to get with</p> <p>6 both sergeants and to tell them.</p> <p>7 So this took place in the -- in around the</p> <p>8 time in the summer, when -- after I filed my</p> <p>9 grievances.</p> <p>10 Q. Moving on to Paragraph 131 located on Page</p> <p>11 24, it says, "Since it terminated Mr. White, VCSO has</p> <p>12 made remarks that deputy sheriffs who file complaints</p> <p>13 against management for discrimination will end up like</p> <p>14 Mr. White." Can you tell me what this is about?</p> <p>15 A. Yeah. Sergeant Bobby Martin said something</p> <p>16 to Poole in the patrol room, said, "All right, now.</p> <p>17 You don't want to end up like your boy." And Pool</p> <p>18 said, "What boy?" "Fired."</p> <p>19 and So something for that nature. There could</p> <p>20 have been other things that's not coming to the top of</p> <p>21 my head, but that was one of them.</p> <p>22 Q. So was any -- do you know of anything that</p> <p>23 was said about you by Peter White after October 23rd</p> <p>24 of 2018?</p> <p>25 A. I don't know what he said.</p>

<p>1 Q. Can you identify any statements he made? 2 A. No, I can't. 3 Q. How about Lawrence D. Bullock, can you 4 identify any statements he made? 5 A. No, I can't. 6 Q. How about Weldon Wallace Bullock? 7 A. After I had my -- I can identify the 8 statements he made during the unemployment appeal that 9 they appealed after I won against the County. And 10 then I can -- the County and I did a -- under my 11 former lawyers, did a Rule -- Rule 408 meeting. 12 And sometime after that, I learned that it 13 was going around through the Sheriff's Office that 14 had met with them and that it was said by management 15 whomever it was, "We don't want him back." 16 Q. And you said there were statements made 17 during an unemployment appeal. What were those 18 statements? 19 A. The same statements that I told you about 20 earlier. When Captain Bullock said that 911 didn't 21 hear it, the information that I requested and said 22 that -- something to the effect that he believes that 23 there was a distinction or disorientation of what 24 was -- I was asking and what they thought it would 25 be. Something to that effect.</p>	<p>222 1 NUMBER 24 WAS MARKED 2 FOR IDENTIFICATION) 3 MR. CASTRO: And I would ask that we 4 zoom into the exhibit. 5 Q. (Mr. Castro) Once you have a chance to 6 review this, please let me know what it is? 7 (Witness examines document) 8 A. I see it. 9 Q. What is this? 10 A. This is -- appears to be a statement from 11 Deputy Patel. 12 Q. Does it say in this statement that you 13 called Patel "Osama" a few times? 14 A. It does. At the end, it says it. It says 15 that, "Then Deputy White said 'Osama' a few times and 16 looked at me." It doesn't specifically say that I 17 called him Osama, but he's referencing that I said, 18 "Osama" and looked at him, implying that I was 19 referring to him. 20 Q. Did you say, "Osama," and look at him? 21 A. No, I did not. 22 Q. So is --- 23 A. It's another deceptive statement from the 24 members of the Vance County Sheriff's Office. 25 Q. So is Deputy Patel lying about this?</p>
<p>223 1 Q. Okay. I'm going to ask the same question 2 about anything that was said by Peter White that you 3 can identify as of August 4th of 2019. Can you 4 identify any statements? 5 A. August 4th of 2019. He may have said some 6 things. Nothing that's coming to the top of my mind. 7 Q. How about Lawrence Bullock? 8 A. They were retired by that time -- August 9 4th, 2019. He may have said some things, but nothing 10 is coming to the top of my head. 11 Q. Is that the same for Weldon Wallace Bullock? 12 A. Outside of what I've already told you, yes. 13 Q. Okay. So you mentioned that you worked with 14 a Deputy Patel. Is that correct? 15 A. Yes. 16 Q. Did you ever call him any racial slurs? 17 A. No. 18 Q. Did you ever --- 19 A. I do not remember calling him any racial 20 slurs. 21 Q. Did you ever call him "Osama"? 22 A. No, that -- no. The name "Osama" was called 23 by Sergeant Bobby Martin. 24 Q. Can I turn your attention to Exhibit 24? 25 (DEPOSITION EXHIBIT</p>	<p>225 1 A. He's lying because I do not remember any of 2 this, and I contend it did not happen. 3 (DEPOSITION EXHIBIT 4 NUMBER 4 WAS MARKED 5 FOR IDENTIFICATION) 6 Q. Okay. I'm going to get to conclude. 7 Exhibit 4 is a Motion for Leave to File Amended 8 Complaint. And I'm going to turn your attention to 9 Document 32-1, which is the second document. 10 On the second page of that document, it says 11 in that paragraph before the argument, and I'm going 12 to let the reporter scroll to Page 2 of 10 of Document 13 32-1, and that -- you are there? 14 A. I'm -- I'm --- 15 MR. CASTRO: There we go. Scroll up a 16 little bit, please. 17 Q. (Mr. Castro) That paragraph before the 18 argument section, can you review that? 19 (Witness complies) 20 A. "Since Plaintiff's Complaint was filed, 21 Defendants' continued discriminatory and illegal 22 actions have unjustifiably prevented Plaintiff from 23 securing employment in his chosen field, negatively 24 impacted his financial prospects and caused him severe 25 emotional distress. The continued actions of</p>

<p>226</p> <p>1 Defendants have necessitated the naming of Sheriff 2 Curtis Brame as a party to the case and given rise to 3 new causes of actions which Plaintiff seeks to add 4 through his Amended Complaint. Additionally, pursuant 5 to the law, Plaintiff seeks the leave to add the 6 Sheriff's surety."</p> <p>7 MS. ROBINSON: I'm going to object to 8 this. This is attorney-client privilege. Not only 9 that, but the court has ruled on this matter and Brame 10 was not allowed to be named. So it's irrelevant. It 11 exceeds the scope of this case at this point.</p> <p>12 MR. CASTRO: Okay.</p> <p>13 MS. ROBINSON: And he's answered the 14 question.</p> <p>15 MR. CASTRO: I'll ask you not to make 16 speaking objections again.</p> <p>17 Q. (Mr. Castro) So how have the Defendants 18 prevented you from securing employment, exactly?</p> <p>19 A. Because they have blocked my prospects with 20 this report of separation, saying that -- internal 21 investigation, and they have falsely charged me with 22 excessive force when there is no excessive force. And 23 they have given negative references.</p> <p>24 Q. What negative ---</p> <p>25 A. To my prospective employers.</p>	<p>228</p> <p>1 excessive force file, the internal affairs file for 2 the excessive force.</p> <p>3 And he said if it's just that, you know, 4 based on what I'm telling him as I previously told you 5 about her arm being broken and she been aggressive, 6 cetera, then I shouldn't have a problem. And so he 7 went down there. He said he had to see the file, and 8 there was some other things that he said.</p> <p>9 Said that he was going down there and, you 10 know, take a day off and, you know, look at my file, 11 talk to Vance County, et cetera. And he assured me 12 that he was going to let me know what Vance County 13 said.</p> <p>14 And I called him later on, and he confirmed 15 that he had just left Vance County and that he had 16 spoke to former -- my former supervisors, the 17 officials at Vance County. I asked him for names. He 18 would not give me names. He just said, "Management 19 And I asked him about the -- the use of 20 force, the excessive force report. And he said, 21 "Well, there isn't much to that. There's not a lot to 22 it." I said, "Okay." He said, "But there are other 23 things."</p> <p>24 And I said, "When you talk about other 25 things," I said, "Are you talking about a write-up or</p>
<p>227</p> <p>1 Q. What negative references are you referring 2 to?</p> <p>3 A. Of me working at the Vance County Sheriff's 4 Office and the incidents that took place there 5 involving my excessive force, if not other things. 6 But the thing that keeps coming up is the excessive 7 force.</p> <p>8 Q. Do you have any proof that anyone from the 9 Vance County Sheriff's Office has contacted 10 prospective employers about you?</p> <p>11 A. My attorneys may or may not have the proof. 12 Q. Do you have any knowledge of anyone from the 13 Vance County Sheriff's Office telling your prospective 14 employers bad things about you, or not to hire you?</p> <p>15 A. Yes. I have knowledge that took place. 16 Q. What is that knowledge?</p> <p>17 A. When I applied for G4S special police, the 18 captain at the time -- I can't think of his name. 19 Hold on. It's coming to me. Captain Bryan Kale, 20 K-A-L-E.</p> <p>21 He was interested in hiring me, starting me 22 out somewhere around like \$19 an hour, full-time 23 employee, et cetera. He told me that he was a use 24 force investigator. He had done it for a while and 25 was going to go to Vance County and look at the</p>	<p>229</p> <p>1 something?" He said, "No. The write-up isn't the 2 issue. Everybody got write-ups, but I'm not going to 3 talk to you about it." I said, "What do you mean, 4 you're not going to talk to me?"</p> <p>5 "I just told you I'm not going to talk to 6 you about it. I need time to speak to my deputy 7 chief." And I asked him, I said, "Well, did they give 8 negative references?" And he hesitated, and I asked 9 him again and he said, "Mr. White, I just told you I'm 10 not going to talk to you about it. I need to speak to 11 my deputy chief before I say anything to you."</p> <p>12 And so he said he would call me in the 13 coming days, and he later called me and he told me. 14 He said, "Mr. White, I told you I was going to call 15 you after I spoke with my Deputy Chief, and he's made 16 the decision to -- for me not to tell you anything 17 about what Vance County said. And -- but to tell you 18 that we were not going to proceed -- we will not 19 proceed with your application."</p> <p>20 Q. And is this Bryan with an I or a Y?</p> <p>21 A. I believe it was a Y.</p> <p>22 Q. And what prospective employer did you say, 23 what was their name?</p> <p>24 A. G4S Special Police, Captain Bryan Kale.</p> <p>25 Q. So did you attempt to get re-certified as a</p>

<p>230</p> <p>1 law enforcement officer after you left the Vance 2 County Sheriff's Office?</p> <p>3 A. I did before my one-year ran up.</p> <p>4 Q. Did you have to sign releases to get 5 re-certified?</p> <p>6 A. Well, you know I did.</p> <p>7 Q. So without discussing anything that you 8 talked with your attorneys about or any attorney 9 advice, obviously. When did you decide that you might 10 sue the Vance County Sheriff's Office?</p> <p>11 A. I can't give you that information. I don't 12 have a specific date for you. And I mean, if 13 anything, that is -- I mean, that situation is between 14 my attorneys and I.</p> <p>15 Q. Without discussing any attorney advice or 16 anything that your attorney has told you about this 17 case, was there any specific incident that made you 18 think you should file a lawsuit against this the Vance 19 County Sheriff's Office?</p> <p>20 A. I can't discuss that information. I don't 21 have a specific -- specific date for you.</p> <p>22 Q. Okay. That's fine.</p> <p>23 A. And outside of specific date -- specific, 24 excuse me. Most certainly we'll venture into 25 attorney-client -- client privilege if that's the</p>	<p>232</p> <p>1 A. I don't know what he witnessed. He was 2 there when I worked there.</p> <p>3 Q. Okay. And the final exhibit that I will 4 show you today is one that we sent recently, which is 5 marked as Exhibit 28. And I will ask the reporter to 6 show it and I'll ask you to review it and let me know 7 what this is?</p> <p>8 (DEPOSITION EXHIBIT 9 NUMBER 28 WAS MARKED 10 FOR IDENTIFICATION)</p> <p>11 (Witness complies)</p> <p>12 A. I know what it is. It's a tuition 13 reimbursement agreement.</p> <p>14 Q. What was the purpose of this agreement?</p> <p>15 A. Tuition reimbursement.</p> <p>16 Q. Did this create an employment contract with 17 the Sheriff's Office?</p> <p>18 A. No. It didn't create an employment contract 19 with them.</p> <p>20 Q. Does this agreement constitute a contract 21 with the Sheriff's Office?</p> <p>22 A. It certainly does not.</p> <p>23 Q. Have you searched for that two-year contract 24 that you mentioned?</p> <p>25 A. I have and I'm unable to find it.</p>
<p>231</p> <p>1 case.</p> <p>2 Q. Of course. Yes. I'm not asking about that.</p> <p>3 A. Uh-huh (yes).</p> <p>4 Q. Okay. So in conclusion, finally, you 5 identified William Taylor Bartholomew as someone who 6 might have knowledge about your case. Who is Mr. 7 Bartholomew?</p> <p>8 A. Mr. Bartholomew is a former Detective 9 Sergeant at Vance County, former Detective Criminal 10 Investigator at Vance County.</p> <p>11 Q. What does he know about your case?</p> <p>12 A. Considering that he's an Internal Affairs 13 investigator and Vance County Sheriff's Office sent 14 him and Major John Shelton to go through IA, which 15 covers use of force.</p> <p>16 He would -- and he would have the ability to 17 distinguish whether or not this was a quick, trumped 18 up investigation, no thoroughness, or whether or not 19 there's any credibility to the excessive force. As 20 he's investigated multiple incidents, so if not 21 multiple, at least a few at the Sheriff's Office 22 involving other deputies.</p> <p>23 Q. Does he have -- did he personally witness 24 any of your treatment at the Vance County Sheriff's 25 Office?</p>	<p>233</p> <p>1 MR. CASTRO: Can we take a five-minute 2 break and then likely no more questions? Thank you.</p> <p>3 THE COURT REPORTER: We are off the 4 record.</p> <p>5 (Brief recess: 6:35 p.m. to 6:40 p.m.)</p> <p>6 THE COURT REPORTER: We are back on the 7 record. The time is 6:40.</p> <p>8 Q. (Mr. Castro) Just a couple more questions. 9 Other than the Bryan Kale incident that you described, 10 do you have any other proof or incidents where VCSO 11 tried to stop you from gaining employment?</p> <p>12 A. Sorry. Brian, I was coughing. Can you 13 repeat that question?</p> <p>14 Q. No worries at all. Other than the incident 15 with Bryan Kale that you described, do you have any 16 other proof or incidents that you can describe where 17 VCSO tried to stop you from gaining employment?</p> <p>18 A. There may be some proof that my attorneys 19 have that's not coming to me. I do know when I -- 20 hold on. Give me a few seconds, if you don't mind.</p> <p>21 When I applied for Wake County Sheriff's 22 Office for a deputy sheriff, they asked -- the 23 recruiting officer asked about my -- if I was BLET 24 certified, and I said yes. They asked if I had my 25 general -- no. No, no.</p>

<p style="text-align: right;">234</p> <p>1 I told them I had my general certification 2 and they said, "Okay, great." And they asked where 3 was previously, and I told them. (Witness coughs) 4 Excuse me. And they asked what did my F5 report of 5 excuse me. Excuse me. Report of separation say. 6 They asked if any of the boxes were checked 7 and I told them yes. Internal investigation, 18 8 months. And they said that -- that's going to be a 9 problem. 10 And they asked, "First, I need to know -- 11 said, "First, I need to know what -- what internal 12 affairs investigation they were referring to, and I 13 told them. I said, "It doesn't say specifically, but 14 I believe it's -- it's for my use of force, excessive 15 force allegation." 16 They asked if it was sustaining and I said, 17 "According to the Department, it is." And so they 18 told me that the Sheriff would most likely not hire 19 me, but he was going to talk to his Lieutenant and 20 Captain and see what they say. 21 And so the word came back down. I believe 22 the investigator was Nicholas O. -- Nicholas O. Hall 23 or Nicholas O. Garvey, somewhere around -- some 24 like that. 25 Said that a lieutenant, I believe he said</p>	<p style="text-align: right;">236</p> <p>1 And I'm not Superman and I'm not God. I can't 2 remember everything. 3 MR. CASTRO: Well, I appreciate you 4 telling me what you do recall and I appreciate you 5 sitting for this deposition for such a long time. I 6 have no further questions at this time. 7 MS. ROBINSON: Can I have a few minutes 8 to see if I want to do any kind of redirect? 9 MR. CASTRO: Yes. 10 THE COURT REPORTER: We are off the 11 record. The time is 6:45. 12 (Brief recess: 6:45 p.m. to 6:51 p.m.) 13 THE COURT REPORTER: We are back on the 14 record. The time is 6:51. 15 EXAMINATION 16 BY MS. ROBINSON: 17 Q. I have a couple of questions for you. 18 First, I would like to ask, is there a distinction 19 between a traffic ticket and a criminal summons? 20 A. No. They're virtually the same thing. 21 Q. By that, what do you mean? 22 A. You can charge a criminal summons -- a 23 criminal summons, you can charge for infractions, 24 misdemeanors. Some law enforcement officers charge 25 for felonies on a criminal summon, although it</p>
<p style="text-align: right;">235</p> <p>1 Lieutenant Bobby Sutton -- Sutton, S-U-T-T-O-N, gave 2 him an answer and said that the Sheriff was not going 3 to hire me with my form marked, my -- with the 4 excessive force as well. 5 Q. Did he inform you that he had spoken to 6 anyone at the VCSO? 7 A. I don't know -- I don't know if he spoke to 8 anybody there. 9 Q. But he saw your F5 form? 10 A. I believe so, yes. 11 Q. Other than those two incidents, anything 12 else about preventing you from securing employment? 13 A. Other than the excessive force, the 14 departments kept saying the excessive force is the 15 issue with Vance County, things that Vance County 16 with the excessive force. 17 So evidently, what happened with G4S, when 18 the Captain wouldn't go into detail, wouldn't answer 19 my question about them providing negative reference 20 and why he's not going to talk to me, et cetera, when 21 he said that he would. And saying he was going to 22 wait until he spoke to his Deputy Chief and those 23 incidents. 24 Like I said, there may be other instances. 25 It's -- it's a lot of stuff that's happened, Brian.</p>	<p style="text-align: right;">237</p> <p>1 shouldn't go up there. It should go on a warrant or a 2 mag magistrate's order if you have that person in your 3 custody. 4 Q. Is a person arrested if they receive a 5 criminal summons? 6 A. No. Although some of the charges that may 7 be on a criminal summons is an arrestable offence, 8 that person is -- the officer or the deputy or -- 9 would draft a criminal summons, present it to the 10 magistrate judge or a judge. 11 The judge would review it, swear the officer 12 or, you know, the deputy in, get a brief testimony 13 just to determine probable cause. If the court 14 declines probable cause, you can't move forward. If 15 the court allows probable cause, approves it, they'll 16 either sign it and then you go serve it. 17 You or another law enforcement officer will 18 go serve it. And then after you serve it on them, you 19 would -- you'd do a return that goes to the clerk's 20 office. 21 Q. So I'm going to change gears a bit. You 22 spoke about your complaints of discrimination being 23 made. When did you first make a complaint of 24 discrimination? 25 A. The first complaint of discrimination in</p>

<p>238</p> <p>1 terms of my internal -- are you referring in terms of 2 my internal EEO grievances? 3 Q. No. Either oral or written. 4 A. The oral complaints, they were made in 2017 5 There were issues prior to any written warning, any 6 suspension, any internal or external EEO-protected 7 activity that went to the Sheriff, the HR Director and 8 the EEOC. There were issues well before I put 9 something on paper. 10 Q. What were those issues? 11 A. The homophobic statements by Sergeant -- 12 can't think his name. It'll come to me. Sergeant 13 Martin, Bobby Martin. When he was a criminal 14 investigator in the process of becoming a sergeant 15 around the same time. And which he later apologized 16 for, but that still happened. 17 Q. What homophobic statements did he make? 18 A. He said that -- I'm sorry? 19 Q. What homophobic statements did he make? 20 A. He said that I was gay and that's what he 21 heard, and he said that I was getting rammed by a man 22 and that I was sucking a man, and which I was not 23 Q. And who did you report that to? 24 A. I talked to Sergeant Roberson about it. 25 Q. What did Sergeant Roberson say? Was there</p>	<p>240</p> <p>1 But what the -- the testimony I've previously provided 2 and currently provided -- providing, excuse me. 3 Q. Okay. And I have one final question. When 4 you were transferred from your initial squad, did your 5 hours change? 6 A. No. In terms of pay? That's what you're 7 referring to? 8 Q. No. The shift. Was there a shift change? 9 A. Yes. There was a shift change, but there 10 was no compensation change in terms of the hours I was 11 working. 12 Q. What was the -- what was the shift change? 13 A. I went from Sergeant Roberson's shift to 14 Sergeant Alexander's shift. 15 Q. What was Sergeant Roberson's shift? 16 A. I mean, both of the shifts rotated. One was 17 on day, one was on night. 18 Q. Uh-huh (yes). 19 A. So I would've -- if for example, when I was 20 transferred, I would've been working day shift with 21 that Roberson and then when I transferred, I was working 22 night shift with Marin. But if I would've transfer 23 from Marin to Roberson, then it will be vice versa, 24 depending on which rotation has day shift or night 25 shift.</p>
<p>239</p> <p>1 an investigation? 2 A. No. There was not an investigation. He 3 said something about that -- that I could file a 4 complaint. He said that I was new there. He told me 5 he apologized, and so they might not do anything with 6 it, they being management, leadership, supervision. 7 Q. You started to say that there were many 8 complaints before you decided to put anything in 9 writing. Does anything else jump out at you? 10 A. The purple unicorn. There were complaints 11 about Sergeant Campbell and I when I worked -- 12 was in field training with him for two-and-a-half, 13 three weeks, approximately. 14 I recognized whenever we went to calls 15 involving minorities, specifically black males, that 16 (witness coughs) -- excuse me. Excuse me. That had 17 was hostile. He -- it's as if he had a vengeance, a 18 grudge about them -- about us. Excuse me, about 19 He did not like African-American males for 20 whatever reasons, based on his conduct and egregious 21 behavior -- behaviors. But when it came to 22 Caucasian-Americans, he was very respectful. 23 And this just goes back to Deputy Isaiah 24 Green's assessment without my influence or statement 25 formulating his own opinions, which were consistent</p>	<p>241</p> <p>1 Q. Was there a change -- did the change in 2 supervision, do you think it led to a change in your 3 ability to grow? 4 A. Well, D. Ray was more of a -- he was 5 with respectful, laid back. He was -- he's somebody that 6 can lead, somebody who worked with his officers in the 7 field. Sergeant Alexander, based on what I heard and 8 some of the things I saw, he had the ability to, you 9 know, lead. 10 But for whatever reasons, he couldn't get to 11 when work on time, constantly late, absenteeism, tardiness. 12 Shutting down whenever something going on, not 13 working, not responding to calls. Later saying that 14 he don't have to answer calls because he is a 15 supervisor. 16 So I will say that things were moving along 17 under Sergeant Roberson more so than Sergeant 18 Alexander. But things could have been better had 19 Lieutenant Campbell not set out to persecute or 20 prosecute me wrongfully for whatever reasons. 21 Q. Out of all the complaints you've made, was 22 there any investigation? 23 A. There was an investigation allegedly ordered 24 by -- well, Sheriff White eventually, after he talked 25 to Director Johnen, did an investigation as far as the</p>

[illegible]

Exhibits	-	17 12:5 125:23 126:2 207:12 218:22
7180 Justin White 02-10-21 Exhibit 1:13 21:10,11,14	--I 134:16	18 205:23 207:3,10 234:7
7180 Justin White 02-10-21 Exhibit 3:15 87:21,22,24,25 155:18 216:25	0	18-week12:5
7180 Justin White 02-10-21 Exhibit 4:17 225:3,4,7	07:01 242:23	18th 108:4
7180 Justin White 02-10-21 Exhibit 6:19 22:1,2,4,5	1	19 169:22,25
7180 Justin White 02-10-21 Exhibit 9:21 89:8,9,11	1 21:11,14 90:8	1:21 74:24 75:1
7180 Justin White 02-10-21 Exhibit 10:23 98:3,4,7,8	10 98:4,7,8 113:25 225:12	1st 104:25
7180 Justin White 02-10-21 Exhibit 11:4 101:2,3,6 102:12	10-18 113:24,25	2
7180 Justin White 02-10-21 Exhibit 12:6 104:3,4,5,19	10-28 135:1	2 91:6 125:15 170:24 225:12
7180 Justin White 02-10-21 Exhibit 13:8 107:21,22,25	10-29 133:23,24	20 49:2 52:18 78:9 160:4 185:15 209:10,12 220:7 244:19
7180 Justin White 02-10-21 Exhibit 14:10 120:12,13,15	10-29s 133:1,10 135:4 136:21	2012 18:2,3 160:20
7180 Justin White 02-10-21 Exhibit 16:12 125:2,3,6	10:00 142:11 143:4,9	2015 18:3 55:6,7
7180 Justin White 02-10-21 Exhibit 17-Placeholder	10:15 8:2,4	2016 18:15 19:10
7180 Justin White 02-10-21 Exhibit 19:16 169:21,22,25	10th 8:5	2017 15:22 18:16 19:11,21 23:13 27:19 42:23 43:11 53:10 60:1 63:7 72:12 75:3 80:9 93:6 100:8,14,17 107:7 195:25 238:4
7180 Justin White 02-10-21 Exhibit 20:18 209:10,11,12	11 101:3,6 102:12	2018 20:5,7 84:7 89:25 99:3,16 100:9 101:13,17 104:25 108:4 113:2 117:5 126:9 127:18 132:8,13 147:18 159:11 170:9,11,14 177:10,12 178:21 193:8 196:1 207:16,18 218:11 221:24
7180 Justin White 02-10-21 Exhibit 24:20 223:24,25 224:1	110 220:10	2019 211:5 223:3,5,9
7180 Justin White 02-10-21 Exhibit 25:22 204:18,19,20	11:00 142:12 143:10	20191910003143:24
7180 Justin White 02-10-21 Exhibit 28:4 232:5,8,9	11:05 38:9,10	2021 8:5 243:22
	11:14 38:10,12	20th 89:25
	12 12:8 89:3 104:3,5,19 116:3	21 220:10
	123 155:20	22 207:16
	12:00 138:18 140:5 142:13 147:6 180:20	22nd 147:18 167:17 170:9,11 207:15 243:22
	12:06 70:21,22	23 155:20
	12:12 70:22,24	23rd 207:15 221:23
	12:17 74:23,24	24 221:11 223:24 224:1
	13 107:22,25 217:2	24- 208:3
	131 221:10	24-hour208:4
	13th 211:4	24th 188:13
	14 120:13,15	25 78:9,11 204:18,20
	15 100:17 160:4	
	15th 211:5	
	16 88:1 125:3,6 207:11	
\$		
\$19 227:22		

25th 207:18 27 117:5 127:18 27th 100:8 28 232:5,9 2:00 138:17 140:3,4,5 141:6,7,21 143:11, 21 144:4 145:22 147:10 181:1,20 2:04 97:24,25 2:10 97:21,25 98:2 2:58 124:12,23,24 <hr/> 3 <hr/> 3 87:22,25 155:18 171:1 216:25 3-17 127:17 3-17-2018 127:5,7,9,11 3-27 127:17 3-27-2018 127:10,16 30 115:10 146:6,15 30th 101:13 127:2 32-1 225:9,13 39 50:25 3:00 188:13 3:17 124:24 125:1 <hr/> 4 <hr/> 4 225:4,7 4-3-18 120:23 408 222:11 47 88:1 155:20 4:04 155:10,13 4:20 165:2 4:52 186:24,25 4th 223:3,5,9 <hr/> 5 <hr/> 50 99:7,12 52 217:1	5:00 144:5 145:22 5:24 186:25 187:2 5A 204:24 205:1 5th 27:9,12,15,18,19 28:7 100:9,14 211:4 <hr/> 6 <hr/> 6 22:2,5 6-8 171:3 69 218:7 6:35 233:5 6:40 233:5,7 6:45 236:11,12 6:51 236:12,14 <hr/> 7 <hr/> 7 100:16 78 88:1,3 7:00 170:16 7:01 242:21 <hr/> 8 <hr/> 8-15-1989 10:14 82 88:7 84 218:22 8:00 170:16,18 8:30 117:19 127:25 <hr/> 9 <hr/> 9 89:9,11 127:25 911 66:17 68:22 69:3,16,21 70:11 71:6, 12,24 72:1,6,9 93:20 109:6 111:13 115:22 134:19 135:1,9 136:19,21,25 163:21,22 164:2,3 185:2,8 222:20 9:00 127:22 170:19 9:40 127:5,22 9:40:52 127:16	<hr/> A <hr/> A-N-T-O-N 42:25 a.m. 8:2,4 38:10,12 140:3,4,5 141:6,7,21 143:12,21 144:4 145:22 147:6,10 181:20 ability 204:7 231:16 241:3,8 absent 48:9 absenteeism 241:11 absolutely 74:12 102:15,21 academy 55:11,16,18,19,23 accept 26:14 61:14 acceptable 26:22 accepted 62:25 access 199:3,7,9,11 accompanying 45:5 accomplished 82:17 account 59:12 accurate 59:12 91:13 100:21 109:17,19 123:24,25 124:1 130:18,21 131:4 139:10 205:19 206:18 207:20 243:14 244:8 accused 164:17 achieving 13:8 acknowledge 8:10,13 act 157:1 195:20 acted 50:12 149:24 acting 15:1 62:13 151:11 152:9 154:14 action 76:23 96:23 99:8 123:19 243:18 actions 99:21 152:24 198:5 219:18 225:22,25 226:3 active 137:3 activity 154:5 176:25 177:18 178:10 181:16 215:7 238:7 actual 153:15,23 Adam 54:6 adamant 153:12 181:18 182:20 184:6 add 122:8 214:20 226:3,5 addendum 244:10 245:1
---	--	---

additional 23:21 143:20,22	agreed 107:16	answering 34:23 37:2 73:7 206:9
Additionally 226:4	agreement 8:21,22 179:19 180:12 232:13,14,20	answers 10:2
address 43:15 83:25 106:18	agrees 84:14	Anton 142:21,24,25
addressed 36:17	ahead 64:7,8,10 81:9 110:12 119:25 121:19 129:4 141:18 159:5 211:19	Antwon 142:24
addressing 43:5	air 61:13	anymore 58:11 64:7 91:9
adhered 183:19	Albemarle 55:5	anyone's 39:5 88:17
adjacent 199:1	Alexander 32:9 47:24 48:20 49:10,15 51:16 52:4,7,14,21 53:2,5,13,19 61:1 63:3,4,8,18 64:24 66:14 69:1,14 75:22 76:18 77:1 85:12 86:5 92:12,19 93:2,7 108:4 111:25 112:7,16 114:7,22 115:13 15 116:2,19,20 122:17 218:9,19 241:7,18	anytime 159:14,15
adjourned 242:24	Alexander's 60:25 72:10 75:4 77:12 109:11 240:14	anywise 243:16
administered 8:14	Alexander's 56:2	apartment 138:20
administration 2:14 13:1	Algretta 58:13	apologized 238:15 239:5
admission 98:23	allegation 155:22 197:11 213:24 217:1 2 218:7,22 234:15	Apparent 171:1
admit 129:17	allegations 58:16 98:16 163:11 196:23 197:1 207:23,24 216:13,24	appeal 84:9,10 133:5 222:8,17
admitted 40:15 47:4 66:6,7 76:19 104:8	alleged 35:24 37:4 64:18 67:18 133:4,7 149:5 177:16 204:12 208:19	appealed 197:9,15 222:9
admitting 41:5	allegedly 37:6 39:21 43:5 60:22 70:7 108:9 113:15 123:20 179:23 195:24 241:23	appearance 45:3,8
advanced 39:4	allowed 13:21 226:10	appeared 243:6 244:18
advice 102:22 230:9,15	allowing 209:6 210:1 219:19,20	appears 78:24 88:1 101:12 125:14 128:14 129:6 130:1 170:3 211:4 224:10
advise 102:20	alluded 147:23	applicant 213:4
advised 102:15 105:8,21 112:15	aloud 90:3	application 4:19,22 26:5 99:7 229:19
affairs 207:24 208:2 214:12 228:1 231:12 234:12	amended 21:17 87:25 155:19 216:25 225:7 226:4 245:8	applied 23:12,14 24:10 85:24 151:3 214:24 227:17 233:21
affected 204:6	Amendment 75:17	apply 23:9,10 212:4,6
affiliated 126:18	amount 14:16,19 139:11 160:3	approach 50:23 108:23 133:15
aforementioned 43:8 244:6	and/or 245:5	approached 3:17 109:1
African-american 43:12 46:20 54:17 140:21,25 194:1 195:23 239:19	Andre 54:7,25 104:8,18 108:15 111:1	approve 63:25 64:2 68:1,4
African-americans 92:7	Andrew 242:7	approved 26:22 84:2,5,12 123:20 168:11
aftercare 170:3	ankles 163:1 164:20	approves 84:10 237:15
afternoon 41:25 142:7 144:19	announce 46:17	approximate 38:16 193:9
afterward 128:15	another's 56:21	approximately 2:5 15:22 20:5 32:15 42:21 60:2 73:3 99:6 127:25 160:8 170:19 175:23 177:12 207:9 239:13
agency 12:8 160:21 166:21 213:3 216:10		April 23:13 84:7 87:11 196:1
aggression 5:5 169:2,3		area 31:12 139:8 171:4
aggressive 15:9 150:24 153:1 164:21 214:1 228:5		Argretta 39:2,18 98:22 102:5 148:16
aggressively 154:15		Argretta's 101:19 102:9
aggressiveness 69:3,10		argument 108:6,8,10 144:7 225:11,18
agree 9:1 58:9,24 78:11,14 87:12 90:4 144:10		arguments 74:17,18

arm 13:17 151:2,3 153:3,4 155:7 158:16 161:18 162:3,11,12,14,17,21,23 166:2,21,14:1 18,20 167:9,19,24 168:2,6,10,12,20,23 24,25 169:6,16,17,18,19 170:25 183:15 214:2,3 216:21 228:5	attacked 153:1 155:6 167:12 169:7 2,21,14:1 attacking 156:20 157:9 164:22 attempt 17:9 128:10 129:6 229:25 attempted 17:11 133:15 182:6 attempts 186:18 209:4 attended 27:5 attention 21:14 125:6 148:12,14,15 223:24 225:8 attorney 9:4 10:20 230:8,15,16 242:7 attorney-client 10:9 179:6,9 226:8 230:25 attorneys 8:9 20:12,15 21:2 145:7 200:9 227:11 230:8,14 233:18 August 55:6 223:3,5,8 authority 78:15,21 79:3,6 174:12,14 authorization 109:21 211:21 212:18 authorized 11:12 avoided 183:17,21,25 184:6 aware 17:4,5,16 78:3,5,7 81:12 82:22 172:25 174:4 205:21 206:10 awhile 94:15 126:22	backed 48:19 117:16 118:4 119:12 122:5,6 130:8 131:5 background 1:3 backing 61:6 118:14 119:4,7,24 backup 36:24 139:19,20,22 140:10,16 141:1,2 148:8,9 163:5 164:10,11,17 183:5 backward 93:10 bad 92:5 105:11,16 114:15 166:8 198:18 227:14 badge 189:5 190:8 badger 146:8 badgering 145:13 146:13 bar 56:20 151:2 153:4 155:7 158:11 161:18 162:3,21,23 167:19 168:24 214:2,3 barely 40:15,16 Bartholomew 231:5,7,8 base 14:25 40:20 baseball 199:24 based 14:22,23 39:10 43:5 51:18 52:12,15 60:17,18,19 61:24 65:7 74:15 75:19 77:17 78:11 82:12 101:25 106:7 124:5 128:19 130:1,6,9 131:3 143:19 144:11,2 150:20 174:15 186:9 208:17,19 214:7 228:4 239:20 241:7 basic 11:25 12:6 13:9 55:4 60:8 158:6 161:20 basically 14:11 36:6 114:10 164:18 194:24 204:14 basing 40:22 basis 29:7 42:16 43:6 bat 92:1 bathroom 70:16 baton 13:20 bears 169:20 beef 61:12 began 27:13 114:7,9,11 118:24 begged 99:1 begin 9:20
arms 163:1 164:19 arrangemen 8:19 arrest 52:9 141:21,22,24 143:15 149:15 151:19 152:12,25 153:8,19,22 157:13 162:21 163:14 164:22 168:10 184:3 214:2 arrestable 237:7 arrested 94:10 138:5,7 237:4 arresting 156:24 arrests 100:18 arrive 139:16 arrived 148:21 165:10,13,15 167:2 asks 205:16,21 aspects 13:4 ass 88:25 89:2,4 93:10 111:9 140:18 148:6 assault 88:10 108:18 assaulted 88:9 155:7 213:25 assaultive 15:10 150:24 153:2 164:21 assessment 239:24 assign 52:23 assigned 18:5 53:3 54:1 106:20 154:7 183:25 assist 10:3 assistance 37:1 163:5,6,7 assistant 66:18 69:6 99:19 assistants 199:9 ASSOCIATES 43:23 assume 206:13 212:6 assure 66:1 assured 228:11 asterisk 39:19 Atherton 242:8 attached 135:5 244:10,12	B B&e 131:25 B&es 131:12 132:1 B91 206:7 B9i 206:7 back 22:17 24:22 26:22 33:8 34:5 38:11 41:9 42:9 44:19 46:19 48:10 51:8 55:6 63:5 67:22 68:2,4 70:23 74:25 76:24 80:22 85:16 90:9,12,14 92:2 96:3,19 97:20 98:1,12 102:12 111:20,21 112:1,5,6 113:20 122:3,4 124:25 126:22 133:13 135:6 137:14,25 139:23,24 141:19 145:9 151:7 152:17 155:12 162:17,25 164:19 170:17 171:19 172:18 173:5 178:6 182:4 185:2 187:1 192:14 198:20 220:25 221:1 222:15 233:6 234:21 236:13 239:23 241:5 back-and-forth 7:4	

behalf 154:21 191:11	79:25 80:4,6 83:17 86:6 90:13 103:15,104:8:16 177:3 178:12,13,14,15 179:24
behavior 239:21	180:2,3 181:3 185:3 188:7,19,25 189:1,4
behaviors 195:6 239:21	190:4,16,17 195:17,19 196:10,22 197:4,198:2,5,20 216:19 222:3,6,20 223:7,11
belief 36:25 39:22 40:21 130:9,10,11 184:14 244:7	Bullock's 149:5
believed 137:1 185:9	burglaries 32:1
believes 222:22	Burns 53:17
belt 85:3	Burrell 117:2,4
bender 42:5,20 117:8	business 90:11
benefits 39:7,8 41:5 58:14 77:20	businesses 42:14 46:15
Bertie 18:5 161:15	busy 103:3,9
big 76:4 86:21 91:15 96:21 110:5 123:124:6	buzz 24:25
bigger 104:22	<hr/>
bills 46:15	C
Bin 194:19	<hr/>
birth 10:13 154:11	C.M. 195:24
bit 22:4 93:1 104:22 108:1 147:13 225:16 237:21	calculation 19:1
black 28:15,17 42:7 87:15 91:8,15 110:5 140:20 191:4 192:7 217:23 239:15	call 10:12 25:12 48:8 50:20,23 68:13 69:4 71:12,24 72:1 85:10,15,25 88:14 92:7 95:23 110:18,21 116:2,14 131:21,2 150:5 151:9 156:7,10,13,21 163:3 165:1 171:20 173:11 175:3 176:2 185:24 186:19 200:7,9,25 201:8,9,20,25 202:22 206:24 216:15 218:4 223:16,21 229:12,14
blacks 217:6	called 26:16 27:20,22,23,24 62:7 77:4 86:5,7 88:8 93:20 107:17 108:14 110:14 114:13,14,18,19 115:1 116:18,20 131:18 154:6 164:7,8 165:4 176:4 179:21 185:1 186:7,9,15 188:15 194:18 200:11,16,21 201:22,23 214:4 218:2 223:22 224:13,17 228:14 229:13
blank 202:18	calling 36:23 49:23 73:8 95:18 114:12 156:19 163:5,6 169:12 176:5 187:10 200:8 223:19
blaring 165:15	calls 34:23,24 36:16 37:2 48:2,4,9 57:6,7,8 61:6 113:24 132:1 178:25 239:14 241:13,14
BLET 12:7 13:3 15:12 48:6 55:11 56:2,5,8 60:8,14 64:23 158:6 161:20 233:2	calm 14:1 168:17 217:5
block 204:25	camera 97:17 117:24,25 118:6
blocked 226:19	Cameron 197:8
blue 129:12 135:13	Campbel 13:13,16,19,23 33:3 34:8,13 35:2,5,11 36:1,3,5,6 41:15,21,22 49:19 50:1,6 52:13,21 53:4,6,7 54:5,6 60:4,5,1 61:2,13 62:7,11,12,16 63:5,11,21 64:6,
bluish-gray 28:17	
Bo 140:18 156:5	
board 24:16 25:14,23 26:9 29:24	
Bobby 191:24 192:2 193:12 194:4 220:20 221:2,15 223:23 235:1 238:13	
bodily 108:22	
bond 9:22 150:20 168:18	
bone 167:24 170:25 171:1,2,8,11	
book 44:21,22,24,25 45:1,3,14 46:24 47:2,3,5,6,7,12,14,15,19 51:12,13,21	
	books 51:25
	boom 115:7
	boom' 115:7
	bordered 16:5
	born 12:20
	bother 172:13
	bottom 65:11 123:9
	boxes 234:6
	boy 221:17,18
	brakes 118:22
	Brame 226:2,9
	break 10:9 70:16 97:14 115:5 123:2 124:9 125:13 168:6,9 169:15 233:2
	breaking 131:8,21 144:9
	Brian 8:25 9:20 26:1 32:18 34:20,22 35:9 36:2,19 37:1 70:15 101:13 104:7 210:4 233:12 235:25
	briefly 17:23 42:8 48:1 77:8 149:7
	bring 14:2 21:13 86:5 100:7 112:4 148:12
	Bro 221:1
	broad 132:11
	broadcasting 28:25
	Broadwick 93:4
	broke 114:8 163:2 164:19 167:10 168:23,24 169:6,16,20 214:3 216:20
	broken 164:20 166:2,7,20,23 167:21 168:13,20,22,25 171:2,4,8,11 183:15 228:5
	brought 42:17 107:14 148:14,15
	brutality 164:18
	Bryan 34:21 227:19 229:20,24 233:9,15
	building 25:1
	buildings 46:15 49:22
	Bullock 24:11,12 25:13,15,25 26:16 27:23 28:2,3 29:12,20 31:2 33:4,16 35:3 57:23 59:17 64:15 68:17,20 96:18 101:23 104:10 133:2,3 135:7 136:20 137:16

20,21 65:1,6 67:7 68:8,9 82:7,11 84:1111 123:1,3,5 124:9,13,20 125:5 126:4	changes/corrections 4:11
88:8 89:21 91:18 92:20,21,22,23 93:8,8,12,20,25 128:2,5,6 129:22,24 145:2,6	CHAPLIN 43:23
15 94:7 95:4 108:10,14,16,22 109:25 10,15,17,25 146:5,10,14,17 155:8,14	Chapter 49:2 52:18 185:15 220:7
110:18,21 111:2,8,17 112:16,22 113:16 65:1,3 169:24 171:16,18 186:22 187:1	characterization 24:16
115:11 123:19 175:24 182:4 185:13 204:17,22 209:1,3,14 210:6,8 224:3,5	charge 42:9 44:19 45:2,5,16,23 220:14
197:24 202:10 217:20,22,24 239:11 225:15,17 226:12,15,17 233:1,8 236:3,9	236:22,23,24
241:19 242:1	charged 42:10 44:18 46:5 184:16,22
Campbell's 5:4 54:3 84:3 113:15	226:21
217:5 219:12	charges 23:22 26:25 45:20 52:8 184:18
campus 18:14 19:2,11	24196:20 215:1 237:6
can't 22:25	Charlotte 10:17 57:16
cap 199:24,25	chase 50:8,9
capability 154:1	check 49:22 119:11 205:18 208:20
Capella 12:14	checked 136:18 137:11 234:6
captain 24:11,12 25:13,15 26:16 27:23	checking 42:14 46:15 100:16 207:22
28:2,3 29:11,20 31:2 33:3,16 35:4 57:23	chemical 13:19 158:7
58:5,6,8,22,23 59:16 63:22 64:14 66:2	chief 23:2,7 24:21 25:4,5,6,8,9 33:4 35:3
67:4,10,21 114:12,13,18,19,20 115:1,8	51:24 63:12,13,17,19,25 64:12 84:12
133:2 148:16 149:5 172:21,23 173:11,22,	90:4 96:18 101:23 104:10 166:21 167:20
24 174:2,6,15,19,22 179:23 180:2,4	178:14,15 180:3 196:10,14,22 197:4,5
181:3 187:6,8,17 188:1,7,14,25 189:1,4	198:1 229:7,11,15 235:22
190:4,16 216:19 220:21,25 222:20	child 104:12 109:16 110:4 184:2
227:18,19 229:24 234:20 235:18	choice 212:10
captains 51:24	chosen 225:23
car 44:15 45:21 50:24 51:2,7 59:22 73:20	Chris 68:6 120:22 148:4 191:25
86:24 108:13 110:15,25 111:19,23	circumstance 40:16
112:14 117:14,15,16 118:1,2,4,15,23	circumstances 4:23 36:12 183:14
119:3,4,7,17,18,20,21,24 121:8 129:12	citation 51:12 86:5 90:13 103:14,19
19 134:15 135:17 152:4,7 154:25 155:2,33,24	citations 82:1,2 83:8 218:24 219:1,10,
15,17 166:5 182:12 190:10 200:24	13,16
care 18:11 93:17 115:4	cite 79:25 80:6
career 15:20 178:4	citizen 14:25 15:4 42:5,6
careful 220:3	citizens 13:11 81:8,10,12
Carolina 10:17 11:6,11,12 18:1 20:1	Citizens' 113:9
55:6 135:1 203:19 212:3 243:4	city 50:9 55:6 96:21 102:25 105:23
carry 202:6	106:2,7
cars 46:13 48:13,14,16,24 49:1 50:7,15,	Civil 146:6,15
19 96:2,12,15,22 102:25 122:2	claimed 90:20 137:15,16
case 9:21 19:25 20:18 81:24 120:1 138:1	claiming 83:17 166:1
145:3,8 175:7 226:2,11 230:17 231:1,6,	
11	
cases 143:17	
Castro 8:25 9:19,21 21:13 32:1 38:1,5,7,	
13,22 70:17,25 71:3,4,15,17,22 72:4,5	
74:20 75:2 87:24 97:13,20 98:6 101:5,10,	
cell 73:5	
center 48:12 85:4 86:23 164:4	
centered 13:8	
Central 43:19	
certificate 12:1,7	
certificates 12:4	
certification 1:24 12:2,10 204:8	
214:23 234:1 243:1 244:1	
certifications 2:4 45:13	
certified 48:21,23 54:6,7 61:20 62:2	
63:2 75:14 103:25 157:16 208:2 214:20,	
233:24	
certify 243:5 244:3,17	
cetera 12:23 30:8,25 37:3 40:10 42:14	
44:7 45:24 46:16 56:15 61:8 82:21	
167:12 182:7 192:15 194:21 198:19	
214:1 227:23 228:6,11 235:20	
chain 18:23 19:16	
challenge 41:5	
challenged 58:13	
chance 224:5	
chances 208:14	
change 67:11 77:12,15,17,18 79:2	
179:13 237:21 240:5,8,9,10,12 241:1,2	
change/correction 45:6	
changed 77:17 79:5	

clarify 38:19	commission 89:19 41:4 205:18 209:6 244:25	concerned 176:12,18,19 180:15
clarities 38:21	commit 30:7 31:2 137:21	conclude 225:6
class 55:24	committed 185:19 220:6	concludes 242:20
classes 55:9	committee 173:3 174:7,10,13,18	conclusion 231:4
classmates 55:15	committing 34:3 137:21	conduct 66:10 86:14 115:18 181:14 183:22 218:17 239:20
clean 199:13	common 142:6	conducting 100:19
clear 27:11 95:22 103:5,11 156:13 157:9 174:19 176:15,17 194:3 198:8 242:11	communicating 1:8	conference 8:15 220:14,18 243:7,13
cleared 69:14 70:4 112:5 169:17 206:15 218:20	communication 87:13	confidence 208:21
clerk 27:13 80:22	communications 30:9,13 111:13 179:7,10	confirmation 116:24
clerk's 237:19	community-oriented 13:14 185:22	confirmed 207:24 218:19 220:19 228:14
client 113:20 122:25 163:17 181:14 184:13,14 198:10,13 204:11 206:4 208:10 230:25	company 212:1,2	connection 87:8 94:19
close 139:1 188:25	compensation 19:9 240:10	consecutively 243:13
closed 188:21	competently 10:25	consent 8:18 9:14
closely 51:3,5	complain 81:8,10	consequences 34:12
closer 105:6 112:12 116:2,3,6	complained 42:4 69:3,19 70:1,4 83:22 23 196:9	considered 45:18
club 56:20	complaining 6:5 81:13 113:8 162:25 164:13 167:9 179:25	consisted 13:17 39:1
co-workers 55:14,15 74:8	complaint 43:11,13 66:16 68:22 70:10 71:7 72:6,8,9 82:22 87:25 113:7,9 153:182:25 216:25 225:8,20 226:4 237:23 25 239:4	consistent 108:20 239:25
coaching 123:17 146:11,12	complaints 23:21 39:24 43:4 65:12 82:21 176:24,25 177:9,13,23 178:5 181:16 194:25 198:11 201:14 208:25 220:13,16 221:12 237:22 238:4 239:8 10 241:21	consists 22:5 98:9 211:15
code 113:25	complete 119:10 162:3 243:14 244:8	constantly 14:5 241:11
Cody 53:17	completed 80:24	constitute 232:20
colleagues 187:14,17,18,20	complex 138:20	construed 45:18
collection 209:14	compliance 4:4 158:8 169:11	contact 28:4 56:3,4,8 57:11 134:13,14 186:20
collectively 77:8	complied 154:20 183:17	contacted 22:23 25:14 27:8 171:21 172:21,22,24 227:9
college 11:7,12,16 18:14 55:5	complies 108:2 125:9 170:2 217:3 225:19 232:11	contend 67:16,17 225:2
collision 42:5 117:6 120:24 125:13 127:6 128:7 130:23	comply 107:16 150:14 153:20 154:23 157:1,5	contending 80:16 181:6,8
collisions 85:5	composed 192:12	contents 244:4
color 28:17 202:15,17	concern 17:21 86:17,19	contested 40:17 41:2
combined 196:19		context 192:1,11
command 13:18,25 175:6 180:6 221:3		continue 65:3,21,23 86:14 101:21 109:14,23 129:3 131:16
comment 209:16 217:9		continued 136:4 225:21,25
commentary 46:1		continuum 13:16 158:6
commented 17:4		contract 27:21 28:9,10,13,14,15,24 29:5,8,18 30:23 31:1,4,21 33:25 232:16, 18,20,23
comments 155:11 194:16		

contracts 31:13	105:11,16,25 116:1 117:3 131:9 153:2	curse 91:21 142:23
control 14:3 18:11 162:14,15 168:11	175:13 179:20 180:10 184:1 201:11	cursing 82:15 88:11 91:18
conversation 63:9 91:23 92:8 105:12	202:5 203:20 204:3 207:12 210:20 211:2,	Curtis 226:2
106:3	7,10 212:21,24 213:11 214:25 215:14	custodian 163:22,23 164:1
conversational 52:1	216:6,13 222:9,10 224:24 227:3,9,13,25	custodians 199:12
conversations 6:3 55:17 73:10 74:14	228:11,12,15,17 229:17 230:2,10,19	custody 18:11 163:16,19 166:11 184:4
149:19 180:22	231:9,10,13,24 233:21 235:15 242:8	237:3
convicted 184:17,23	243:4 244:16	cut 85:8
convictions 84:16	County's 175:19 242:7	
cool 217:5	couple 60:10 85:20 233:8 236:17	D
cooperate 149:24,25 150:2,14,23	court 8:3 9:2,5,9,13 10:4,11 21:14 27:13	D-U-V-A 192:12
cooperated 149:9 150:18	38:8,11 70:20,23 74:22,25 97:23 98:1	dad 94:2
cooperation 5:6 150:21	124:11,22,25 126:4 127:1 155:9,12	damage 44:15 45:21
cooperative 52:8,21	186:23 187:1 215:10 226:9 233:3,6	damn 88:25 111:9 112:16 156:6
copies 101:24 213:7	236:10,13 237:13,15 242:20	danger 85:1 87:2 157:25
copy 31:4,6,8,21 96:11 99:5 102:3	courthouse 88:17	dark 87:16 157:24
163:20,24 173:13,14,15	cover 42:16 173:19	database 143:18
correct 60:1 72:7 75:3 100:23 123:6,9	covered 43:6 161:10 194:24 198:3	date 8:4 10:13 20:4 21:21 27:7,9,19 28:7
125:17 185:18 223:14	covers 231:15	90:1 100:8 127:12 132:20,22 154:11
correctional 8:6 160:1,11 161:15	crash 86:23	160:18 193:7 206:25 207:6,17 211:3
corrections 8:8 159:18,22,24 160:1	crazy 48:12	230:12,21,23
22 245:5	cream 73:15	dated 101:13 104:24 108:4 120:23
corrective 99:8 123:19	create 232:16,18	dates 100:11 177:8
correctly 110:17 171:5	created 220:12	daughter 43:13 44:6,8
coughing 233:12	creates 175:13	daughter's 43:18
coughs 234:3 239:16	credentials 189:5 190:8	daughter's 44:11
could've 106:25 139:5 154:3 216:9	credibility 231:19	day 24:24 29:24 59:18 73:12 85:13,19,20
couldn't 76:4 114:3	crime 105:25 142:2 185:15,16	86:1 121:17 122:9,23 141:24 142:8
counsel 8:18 21:16 146:1,3 243:18	criminal 11:15,21 12:19,20 45:3 46:1,8	144:18,19 170:15 180:11,16 181:4
counseling 99:20 100:10 123:17 175:22	80:9,11,13,16 81:21 82:19 83:16 90:12	228:10 240:17,20,24 243:22 244:19
Counselor 41:8 65:11 87:20 110:12	23 91:5 96:16 109:4 110:16,19,21,23	
171:25 182:4 185:1 215:25 218:6	111:4 184:3,15 203:19 205:17 218:24,25	
count 128:16	219:10,13,15 231:9 236:19,22,23,25	
counties 116:5	237:5,7,9 238:13	day-to-day 18:9,24
county 8:7 11:5 15:21 16:15 17:6 19:24	criminology 11:15	days 32:9 33:15 61:18 73:13 85:21,23
22:19,24 27:13 28:21 29:12,17 30:8,15	crossing 85:2	113:1 229:13
17 31:19 32:3,10,22 37:14,15,16,17	crying 114:8 151:21 166:19	de 14:11,14
38:15,17 39:3,4,11,12,16,17 41:3,17	cuff 43:25	de-escalate 154:15,18 168:16
49:6	curate 143:17	de-escalation 3:18,23,24 14:17,20
50:4,9,17 54:24 57:16,21 84:24 85:15	current 10:15	158:20
86:11,12 98:15,19 100:13 102:10,25	curriculum 61:11,13,22	deal 86:21 89:3 123:18 124:6 156:16
		160:17

dealing 15:1,4 99:9	21:10,16,17,18,25 22:1 87:21 89:8 98:1	diagnosed 168:1
Dec 100:17	101:2 104:4 107:21 120:12 125:2 126:1	Dickinson 9:22
December 42:23 43:11 55:7 63:7 80:9 93:6 160:20 170:9,10	146:1 151:16 169:21 204:19 209:11	didn't 61:22 76:18 163:8 190:7
deception 43:22 68:8,11 163:11	deputies 16:23 48:16 53:12 56:18 57:2 60:9,13 64:23 67:18 78:15 92:4 93:13 106:11 122:5 141:9 142:14 158:24 160:24 190:23 220:2,15 221:2,3 231:22 242:12	difference 34:14 35:12,16 49:11 57:17
deceptive 65:7 66:4 68:12 108:11 175:25 197:23 198:12 224:23	deputy 13:7 23:2,7 25:4,5,9 31:19 32:18,22 33:4 34:19,20,21,25 35:2,7,8,9 36:2,10,13,14 37:1,6,22 45:12 51:24 53:8,14,15,17 54:6,7,12,13,17,18 57:2 61:3 62:1,4,5,10 63:2,4,12,13,17,19,25 64:12,25 66:12 70:6 73:5 76:2 77:1 84:13 90:4 93:2,17 94:23 96:15 100:17 101:12 102:13 103:2,4,13,14 104:7,8,10,18 105:7,21,24 106:11,18,22,23,24 107:18 108:15 109:15 110:13 111:1 112:15 115:16 120:25 121:16,18 122:9,23 140:21,25 142:20,21,22 143:2 144:1 146:18 147:2 175:7 180:10 182:5 183:13,25 184:9 188:3,4 190:23 191:1,6,8,12 194:17 195:23 196:4,6,10,14,24 199:205:1 217:4,15 218:15 220:22 221:12 223:14 224:11,15,25 229:6,11,15 233:22 235:22 237:8,12 239:23	dinner 56:14 57:14
decide 173:24 230:9		directed 111:5 124:19 221:5
decided 50:15 183:7 239:8		directing 156:22 192:16
deciding 208:3		directions 34:24 37:3 162:4
decision 14:22 35:5 58:10,24 133:6 174:1 214:10 229:16		directly 46:4 61:1 73:18 82:14 167:13 195:15 198:8,21
decisions 78:15,18		director 28:20 39:17 66:18 69:6 166:19 167:21 238:7 241:25
declare 8:15		dirty 92:7,17,21,24,25 93:9,11 94:16
declines 237:14		disable 158:2
decreased 107:18		disagreeing 22:21
deep 216:1		disagreement 13:22
Defendant 22:6		discharging 3:22
Defendants 9:21 225:21 226:1,17		disciplinary 76:23 99:9,21,25 100:3
define 56:13 86:18 119:5		discipline 196:23,24
degree 12:11,16,25		disciplined 196:17
degrees 44:22 45:12		disclose 23:15 213:17 215:1,6,13
delay 118:8,10 128:19,22,23 129:5 138:8		disclosed 23:18,20,25 24:2,3,5 126:21 213:17,19
deliver 24:19,23	describing 64:13 151:20	disclosing 179:6,9
demonstrate 61:23 162:1	deserve 219:5 220:9	disclosures 126:14,21
demotion 77:22	deserved 196:18	discovery 126:14,17
denied 61:15 102:1 148:11 201:13	designed 158:2,19	discretion 47:16,18
dental 39:8	designee 28:21	discretionary 78:20
deny 120:8	desk 106:13 109:3 178:2	discrimination 8:19,21 177:17 216:5 221:13 237:22,24,25
department 13:21 16:24,25 17:14 18:2 20:2 30:19 39:5 50:3 98:19 160:13 177:19 214:13 216:9 234:17	detail 35:14 59:24 68:23 71:5 76:6 235:18	discriminatorily 95:20
department-issued 3:22 18:23	details 161:12 165:4,7	discriminatory 90:19 191:17 194:14 195:3,6,20 198:5,22 219:22 225:21
departments 235:14	Detective 231:8,9	discuss 23:6 47:24 49:10 59:23 65:24 148:20 230:20
depend 36:12	determine 15:4,7 80:18 237:13	discussed 33:8 49:14 127:6 172:2
depending 240:24	determined 196:25 219:4	discussing 34:5 38:13 125:13 128:7 200:8 230:7,15
deposed 9:24 19:22,23	Deval 192:12	
deposition 8:6 9:23 10:10 20:3,11,17	development 38:20	
	device 149:14 161:6	

discussion 43:8,9 111:16 136:16	101:23,25 102:1 123:23,25 209:7	
discussions 42:25 65:10	domestic 93:23 94:10	E
dismissal 59:18 208:24	Donald 53:9 54:11 92:19	e-mail 125:25
dismissed 24:7	don't 50:23 62:23 142:12 146:8 179:5	e-mails 178:25
disobey 79:11	194:1 221:17	earlier 108:20 110:14,20 117:11 162:10
disorientation 22:23	door 61:22 111:24 115:9,12 146:23	194:7,8 217:13 218:13 222:20
dispatch 50:21 71:7 72:9 109:6 165:3	147:10,11 148:24,25 149:10,13,20 152:3	early 42:14 141:23 142:1 144:7,20
dispatcher 69:3,16,21 70:3 72:7	182:10,13 188:21,24 189:3	179:24 195:25
134:19,21 135:9 137:1,7 185:2,8	doors 92:16 146:22 152:15	ease 105:8 106:8
dispute 115:12,14,21,23 171:12	double-wide 38:24 139:7	education 27:2 162:20 163:13
disputes 74:2,3,16,18	downgrade 7:24	Edwards 142:21,22 143:2 144:1 165:18
disputing 127:13 129:8,11,13	downgrading 65:19	188:5
disrespect 192:10 193:23	downs 14:10,14	EEO 178:10 198:10 208:25 238:2 242:7
disrespectful 0:15 109:16 110:3	draft 80:11 237:9	EEO-PROTECTED 8:6
112:23 136:7,8 194:21	dramatically 97:10 107:18	EEOC 23:21 194:25 215:1 220:13 238:8
disrespecting 13:16	dressed 25:2 27:10	effect 26:7 34:14 46:12 48:1 77:19 87:18
distanced 9:2	drew 210:18	91:12 105:14 106:6 109:25 110:23
distinction 136:24 137:19 185:7 222:23	drive 189:23	115:18 121:3 135:23 148:7 150:8,10,11
236:18	driver 119:14	162:21 163:14 166:1,23 169:9 189:8
distinguish 231:17	drives 137:8	191:4 193:16 222:22,25 242:10
distorted 76:12 90:21 91:11 109:18	driveway 148:23 182:12	effectively 206:5
111:7 121:22 140:8,14	driving 85:4 86:23 87:15 117:14	effects 76:9
distortion 133:9 135:9 136:25 137:19	drop 176:24 177:13,14,15,22,24,25	egregious 102:17 239:20
185:7	178:1,3,4,5 208:25	elaborate 12:18 35:15
distress 204:4 225:25	dropped 116:11	elected 178:1
distributive 2:23	drove 116:11	electronic 118:8 128:24
DMV-349 125:10	drug 26:17	Elizabeth 55:6
doc 209:15	dude 46:7	else's 133:21
doctoral 12:13,24	due 175:16	emergency 113:24,25 114:1 116:1,10
doctors 172:3	duly 9:16	121:1,7 163:21 164:2,3
document 21:19 22:8,9,12 28:22 39:20	dumb 194:3	emotional 14:10,11 204:4,16 225:25
89:15,18,19 90:7 98:10,13,14,18,20,21,	Durham 211:1,7	employed 175:3 207:7,11 216:7
25 99:4,11 101:6,9,11,14,15,16,22,25	Durwood 32:13 41:22 63:21 197:24	employee 37:21 41:18 100:10,11 123:16
104:21 105:4 108:5 115:22 120:18,21,22	duties 18:9 77:15,16 136:5	175:22 199:10 227:23
123:9 125:25 170:1 171:7,13,17 206:9	duty 57:9 85:12 202:7	employer 212:23 213:4,5,6 215:2,8
207:17 209:19 210:5,7,25 211:3,18,20		229:22
224:7 225:9,10,12 244:21		employers 213:9 226:25 227:10,14
documentation 19:8 100:3,25 123:22		employment 5:20 17:24 19:9,18 22:18
185:14 216:16		26:12 27:21 28:8,10 29:5 32:2 33:25
documents 20:14,15,16,18,21 31:10		57:21 100:11 126:19 131:9 160:6 174:24
38:16 39:10,15 40:19 41:11 99:25		

187:5 203:4 204:3 205:25 206:20 208:12 209:4,7 212:9,16 214:20,24 215:20 225:23 226:18 232:16,18 233:11,17 235:12	evaluation100:6 evaluations99:10 198:19 Evan 131:15 Evans131:9,22,25 evening144:20 event 103:20 127:17,22 event(s)243:19 events 178:16 181:7,8 eventually26:11 241:24 evidence39:18 71:13 118:7 122:25 evidently61:12 68:25 151:6 235:17 exact 202:17 examination9:18 236:15 245:3 examined166:2,5,9,22 244:4 examines21:19 22:9 89:15 98:10 104:21 105:4 108:4 120:18 210:7 211:18 224:7 examples50:14 217:19 exceeds226:11 excerpt88:5 excess206:6 excessive58:4,16,18,23 59:6,15,16 98:16 105:22 213:24 214:11 216:12,20 226:22 227:5,6 228:1,2,20 231:19 234:14 235:4,13,14,16 exchange29:14 65:4 108:9 113:19 115:15 116:16 exchanged57:3 excuse26:17 37:21 62:5 63:12 69:9 77:17 84:9 86:3 104:25 115:6 120:24 122:16 125:10 137:17 154:19,20 176:6 178:14 219:8 230:24 234:4,5 239:16,18 240:2 execution244:20 executive99:18 214:13 exhibit21:10,14 22:1,4 87:21,24 89:8,11 98:3,7,8 101:2,6 102:12 104:3,4,19 107:21,24,25 112:25 120:12,15 125:26 23 126:1 155:18 169:21,25 204:18,19 209:10,11 216:25 223:24,25 224:4 225:3, 7 232:3,5,8	exhibits22:18 expect81:1,6,14 85:9 expected79:19 expects48:7 experience29:13 30:18 36:8 143:19 144:3,23 162:20 163:14 Expires244:25 explain36:5 59:7 95:4,7,12,13 113:4 204:2 explained32:19 44:6 94:25 105:22,24 106:10 185:1 explore71:4 external238:6 extremely102:11 eyes 62:16,17,19
enforcing203:13 enhance169:11 ensure172:19 ensuring13:7,10 entered145:2,7 entering131:8,22 entire 15:20 19:2 32:10 100:4 129:14 entity 175:18 entrance109:2 epithets191:22 equal 175:17 equipment15:24 16:1,2,5,9,12 18:17 19:14 121:7 200:5 equivalent171:11 Eric 54:18,19 escalated154:22 escalation14:2 escort 14:9 escorting151:24 essentially65:5 estimate73:1 139:11,12,15 et al 8:8		<hr/> F <hr/> F3 24:5 26:5 99:7 215:15 F5 205:3,5 207:20 208:8 234:4 235:9 F5a 204:12 fabric 199:20 face-to-face51:19 56:25 62:7 facility 18:4 161:16 fact 25:10 48:19 50:6,8 66:3,8 87:10 95:3 96:8,15 97:8 99:5 102:22 103:8 111:6 122:4,14 124:5 129:7 130:23 136:10 141:10 157:17 219:2 220:24 221:1 factor 168:12 201:8,12,15,18 factors168:23 facts 36:25 76:19 113:21 140:8,13 181:11 factual107:2 115:14 failing86:22 failure102:17 fair 51:14 113:23 fairness208:23 fall 107:7 falls 141:13

false 97:12 98:16 113:6 196:23 206:1 207:23	financial 225:24	found 58:1 60:19,22 66:4 69:8 100:16 102:3 115:10 139:25 167:22
falsely 92:9,12,13 226:21	find 31:5,22 46:6 60:23 104:16 186:20 200:19 232:25	fourth 89:22 182:2,11
falsification 11:11 197:22	fine 38:5 97:15,18,19 230:22	fracture 151:6 168:4,5 170:23,25 171:2,9,10 172:5
falsiticity 65:8 109:11 197:23	finish 172:15	fractured 151:4 166:24 167:22,24 168:2 183:15
familiar 78:12,13	finished 105:2 123:2 159:4	fractures 171:3
family 21:8 44:3 85:8 172:8 179:1 197:8	fire 173:24 174:2 176:25 177:1,5 180:8,18 181:15 197:8,10 208:5	Franklin 116:5
fan 242:13	firearm 13:22	free 10:11 48:10 81:2
fast 131:23	fired 115:5 180:17 187:21,23 188:13 196:19 197:13,15 200:17 201:21,23 221:18	friends 21:8 55:12
Fast-forward 8:13	firm 9:22	friendship 56:1
father 91:8,15 109:17 110:4,5	fitting 62:21	front 43:14 104:8,17 112:16 140:20,24 142:20,22 143:25 149:10 163:4 177:1 192:19 194:5 221:1,3
fault 120:7	five-minute 7:14 233:1	Fryson 24:21 25:7,20,21
February 8:5 19:10,11 20:7 89:25 104:24,25 113:2 243:22	flashlight 18:21,22,23 19:15	FTO 32:14
federal 98:17 146:6,15	focus 12:15,24 14:17 46:14 78:16 79:20	full 10:5 15:19 19:9 109:11 111:11 172:19
feel 10:10 32:10 44:13	focused 11:20 46:13	full-time 227:22
feet 139:11	focuses 12:21	fun 195:9,11
felonies 236:25	Follow 44:1	fundamentals 3:5
felony 141:15 142:2,19 143:15 155:25 184:2	font 28:15,17	fussing 82:16 88:11 91:17,20
felt 37:4 42:10 130:5 157:4	force 13:13,16 14:3,9,11,14 58:4,16,18 23 59:6,15,16 98:17 132:21 147:17,24 149:4 152:18 155:5 156:15 158:4,5,19 168:15 172:22 173:2,13 174:7,10,18 178:23 187:9 188:3 206:3,6 213:14,25 214:11 216:13,20 226:22 227:5,7,24 228:1,2,20 231:15,19 234:14,15 235:4,13,14,16	G
female 42:7 43:12 46:20 112:8 156:19 195:23 196:5,14,24 197:3 213:25	foregoing 243:7,13 244:5,8	G4s 227:17 229:24 235:17
fender 42:5,20 117:7	foremost 121:23 179:14 205:8 206:1	gain 19:18
field 32:14 36:13,24 41:22 42:15 49:18 50:10 53:7 94:24,25 95:5 102:14,24 103:1 217:17 225:23 239:12 241:7	forgot 186:14	gaining 233:11,17
file 20:25 39:23,24 40:5,14 98:21,23 99:1,5,14,17,25 100:4 101:18,19,20 102:4,9 105:1 194:25 205:12 207:1,6,10 210:17,20 211:10 212:5,25 213:2,6,7 214:8 221:12 225:7 228:1,7,10 230:18 239:3	form 12:19 14:8 100:10 122:24 175:22 197:17,18 205:1 207:20 208:8,15 211:6,12 212:22,24 235:3,9	Garvey 234:23
filed 20:19,22 23:16 43:12 198:9,11 201:14 216:5 220:13 221:8 225:20	forms 40:13 106:13 212:17 214:22	gave 31:8 44:24 45:14 47:6 59:21 61:14 83:17 116:24 134:25 157:4 178:6,9 189:16,20 200:23 202:10 204:11 215:22 216:4 235:1
files 40:18 58:15 69:2 99:9 102:7,8	formulating 39:25	gay 238:20
filled 63:8	forthwith 138:7	gears 237:21
final 22:13 94:23 96:1 121:15 232:3 240:3	forward 25:13 26:23 76:20,22 212:11 19 237:14	gender 65:9,17 88:19 195:10,21,22 197:3 201:15
finally 54:10 231:4	fought 168:10	general 12:1,9 39:11 105:10 171:3 233:25 234:1

generally 38:22 167:8	guidelines 69:8	happened 24:10 32:24 33:20,23 34:6 60:20,21 65:3 68:3 72:9 76:6 90:20 93:2 110:10 111:16 117:9 120:6,11 121:4,9,1 125:18 129:16 131:20 132:8 135:24 136:1 141:5 148:20 149:1,6 162:24 167:171:19,20 173:8 177:4 179:4,12 184:8 187:4 190:10 200:6,12,15,20 201:21 203:11 206:12,16 213:10,20 214:11 235:17,25 238:16
Gerald 35:8	gun 189:5,9 190:8	happening 27:9,12,14 129:9 190:11
get all 45:7	gurney 166:25	happy 133:16
get along 74:1	gurneyed 167:22	hard 13:18 200:19
girl 48:3 93:12,20 94:11	guru 50:2 95:16	harm 108:22
give 10:2 24:25 25:11 30:12 45:1 47:1 50:14 59:20 64:7,8 73:1 81:3 90:6 102:2 104:20 135:19,22 142:15 161:12 162:4 172:19 178:8 190:9 192:1 210:4,13 211:9,17 215:19 219:19,20 228:18 229:7 230:11 233:20	guy 44:9	Harvey 234:22
	guys 48:2,7	hat 34:11 198:15,24 199:16,19,21,23
	H	haven't 76:8 167:14
giving 136:22 219:18	habitually 49:23	he'll 48:8
glad 75:13	half 105:6,19 207:9	head 40:12 44:23 45:6 93:23 94:5 134:7,17 166:22 188:7 198:2 215:3 216:22 221:21 223:10
glasses 157:22	hallway 109:3,6 111:12,15 199:1,3	head-on 85:5
God 236:1	hallways 199:11	headed 50:25 111:22
good 62:1 66:12,15,23 69:14 97:14 105:9 154:20 198:3 216:18 218:14	hammered 163:11	headlights 87:8,14,16 117:10,14 118:16
Goolsby 122:15,19 165:15 171:22,23 172:22 176:6,7 179:21 180:7,21,24 181:17 188:2 196:11 220:21 221:5	Hampshire 2:12 27:2,4	heal 171:3
Goss 81:13 83:4,11,14,25 84:17 86:4,13 88:12 89:13	hand 14:10 156:6 158:13 162:11 243:21	Health 170:6
gots 174:8	handbook 37:21,25 41:18,24	hear 9:7,9 22:19 34:6 48:18 70:25 179:25 194:2 222:21 242:9
government 75:18 179:17	handcuff 152:11,14,19,22 155:4,16 167:11	heard 36:3 61:9,23,25 62:9 63:15 69:9 115:9 122:21 220:23 238:21 241:7
grabbed 153:3	handcuffed 152:4,5,6 155:3	hearing 25:16 133:4
granted 85:25	handcuffing 4:10 150:2	height 54:6 156:14
Graveyard 41:25	handcuffs 150:22 155:6,15 157:12	held 220:14
great 198:4 234:2	handful 50:18 73:3 95:19 119:9 160:5	helping 61:7
greater 142:2 145:19,23	handle 50:21 85:15,25 89:2 148:5 150:17 151:10 173:16	Henderson 26:20 73:15 102:25 167:1
Green 217:4,15 218:2	handled 51:8 116:14 141:4	herein-above 244:18
Green's 239:24	handling 69:4 86:10,11 140:18 141:3 148:6 156:5	hereunto 243:21
grew 192:6,22	hands 13:17,18,19 14:7,8,12,13,18,21 94:3,4 151:1 158:7 162:11 164:23 178:2	Hertford 11:5
grievances 178:11 198:10 221:9 238:2	handwriting 106:15	hesitated 229:8
gross 220:6	handwrote 39:21 40:19	Hey 175:5 192:19
ground 153:5 162:15 167:11	hang 32:21 55:20,22 56:10,12,13,19 57:13 72:16 95:21	he'd 47:13
grow 241:3	hanging 55:13 56:23	
Gruber 243:3	hangs 56:13	
grudge 239:18	happen 29:22 45:25 54:2 90:21 120:9,11 127:6,8,18,22 195:14 220:18 225:2	
guess 47:16 55:14		

he's 241:5	171:10	incident 41:14 42:21 83:4,14 84:1,21 85:17 86:13 89:13 113:11 117:5,12 126:131:18,21 132:7 143:7 147:18 149:4 152:17 159:6,10 167:17 170:5,8,13,17 171:18 172:6 173:9,12 187:5,7,15,22,25 190:2 202:23 207:14 218:20 230:17 233:9,14
hide 212:22	hurt 207:25 208:13	incidents 51:20 227:4 231:20 233:10,16 235:11,23
high 11:4,5	hurting 136:13 166:8,16	including 67:1 68:9
highway 32:24 33:1 34:15 35:12,16 78:4 103:7	hyped 68:9	incorrectly 88:4
hire 213:5 216:8 227:14 234:18 235:3	hypocritical 5:10	increase 220:11
hired 12:8 19:20 33:10 53:22 56:6,8,10 175:24 214:22	I	indirectly 198:22
hires 217:15	I-85 93:5	individual 23:1 24:20
hiring 22:22,25 26:7,18 29:23 212:19 227:21	i.e 102:17	individually 77:7 195:7
Hispanic 42:8 219:3,10,19 220:8	IA 207:6 208:19 231:14	influence 239:24
history 17:24	ice 73:15	inform 81:3 90:17 235:5
hit 44:9 94:2 117:16 118:1,2,4 129:12 153:9,10,11 158:1	ID 8:15	information 1:3 28:25 29:5 32:23 34:9,10 36:25 39:22 40:21,25 58:5 62:6 66:17 114:25 132:24 133:8,13 135:2 136:22 182:14 184:14 202:23 209:21 210:2 212:14 215:6 222:21 230:11,20
hold 97:16 139:23,24 156:6 227:19 233:20	idea 203:22	informed 64:16 90:11 130:16 220:15
home 30:25 33:9 34:1 49:24 59:21 72:18,19 138:11,12,25 139:6,16 146:147:3 148:18,19,22 171:19 182:12 189:16,20,22 190:9 200:24	identification 1:12 22:3 44:4 87:23 89:10 98:5 101:4 104:6 107:23 120:1 125:4 126:3 154:10,11,12 169:23 204:21 209:13 224:2 225:5 232:10	infractions 236:23
homes 56:15 139:4,5,11	identified 23:2,7 24:20 53:10 126:12 231:5	initial 26:9 32:2 126:13,21 133:5,6 240:4
homophobic 38:11,17,19	identify 222:1,4,7 223:3,4	initially 39:14 41:1 52:25 175:21
honor 210:18	identifying 54:13	initiate 77:3
hope 216:24	identity 12:20	initiated 76:25 77:1
hospital 26:21 45:24 76:3,7,11,17 93:5 167:1 171:15 172:9,18	ignore 156:18	injure 87:18
hostile 239:17	Ignoring 41:24 49:13	injuries 120:3 167:16,18
hostility 220:12	illegal 225:21	injury 158:16,18 169:12
hour 38:2 76:15 181:2,3 208:4 227:22	illustration 125:16,20,21	inmates 160:12
hours 56:11 72:13,20 76:16 240:5,10	immunities 79:17	innuendo 94:17
house 31:11 56:22 93:3 144:9,13 145:21 147:16,20 148:5 149:7 181:20,21 182:6,9	immunity 179:15,16 180:14	inquired 83:1
houses 182:6,8,9	impacted 225:24	inserted 40:25
HP 34:15	impaired 87:4	inside 146:24 202:18,19
HR 39:16 59:3,8 177:20,21 198:11 238:7 242:12	impairments 0:24	instance 137:24
huh-uh 10:3	implying 74:13 224:18	instances 100:17 235:24
human 28:20 37:11 98:19	important 31:14,16 164:15,16	instilled 50:11
humerus 167:24 168:2,4,5 170:24	improved 51:2	
	inaccuracies 25:19	
	inaccurate 207:21	
	incapacitated 58:2	

Institution 18:6	involved 41:6,8 68:12,17	Janie 99:17
instruct 219:15	involves 17:17	janitors 199:12
instructed 80:8 145:19 155:24 182:24 183:2 220:16	involving 34:12 76:2,10 115:21 117:6 11 126:9 128:7 213:13 227:5 231:22 239:15	January 8:4 18:15 20:7 100:8 101:13 218:11
instructing 219:24	Iredell 243:4	jeopardy 133:22 157:25
instruction 218:23 219:13	irrelevant 226:10	JJ 156:8
instructions 148:4 156:12 170:3	Isaiah 239:23	job 13:4 16:2 18:7,13,17 19:12,14 22:20 23:10,14 24:6 46:17 49:24 62:1 66:24 101:1 103:12 110:17 173:6 176:8,13,19, 20 183:11,12 185:16 203:5 209:23 216:18 218:15
insubordination 113:9,12	issue 36:16,20,21 39:16 47:18 49:13 63:10 67:18 68:25 75:25 76:1,4,17,22 78:25 79:20 80:23 82:5 86:17,18 87:10, 20 93:21,22 94:4 129:8 174:15 218:24 219:2,9,13,15 229:2 235:15 242:2	jobless 204:8
insurance 45:24	issued 15:19,21,23 16:15,18 46:24 47:11,14 80:12 88:12 90:13 98:14 103:19 106:12 123:20 185:13,14	jobs 79:22
intensity 156:15	issues 32:20,22 34:7,12 60:15,18,19 66:2,3,7,9,10 68:8 75:19,24 76:4 78:25 87:5,7 97:7 184:8 218:16,19 238:5,8,10 242:3	Johen 39:2,18 98:22 148:16 241:25
intent 168:9	issuing 81:17,20,25 82:1,9,18 96:3	John 231:14
intentional 83:16	items 39:19	joining 75:7
intentionally 20:10	It'll 238:12	jokes 74:10
intents 244:21	it's 40:24 48:10 54:8 71:20 90:21 96:1 105:17 125:18 154:8 158:13 162:5 166:23 167:14 171:11 184:21 196:4 198:2 211:11 224:23 239:17	joking 74:6 195:14
interactions 56:24	I'd 31:15 101:16 141:2,4	judge 46:2 150:20 154:21 237:10,11
interested 24:13 227:21 243:19	I'll 169:13,14	July 108:4 177:10,11,12 197:11
internal 178:10 198:9 204:13 205:22,24 206:2,10,19,22,24 207:1,24 208:2 214:12 220:13 226:20 228:1 231:12 234:7,11 238:1,2,6	I'm 92:4 121:22 146:12 159:4 189:13 225:6	jump 239:9
interrogatories 32:7	I've 83:15	jumped 90:14
intersection 16:8		June 19:21 27:9,12,15,18,19 28:7 100:9, 14 177:10
interview 24:9,15 25:3	J	jurisdiction 3:11 160:13
interviewed 25:15	J-A-M-E-L 10:8	justice 11:15,21 12:12,17,19,20,21,22,23
invested 29:15 30:19	J.J. 102:13 192:21	Justin 8:6,7 9:15 10:6 20:1 22:5 129:25 244:3
investigate 96:24 208:2	jail 150:3 153:12 154:22 166:13,15,17 184:7	justly 206:18
investigated 88:23 173:10 175:4 231:20	Jamel 10:6	
investigating 74:24 175:2	James 180:21	K
investigation 75:8 202:24 204:13 205:17 206:2,11,17,19,22,24 207:1 208:4,6,8,14,22 213:14,15 226:21 231:18 234:7,12 239:1,2 241:22,23,25 242:4	Jamie 81:13,16 83:4,11,14,25 84:17 86:4,13 88:12 89:13	K-A-L-E 227:20
investigations 109:5 175:12,20 205:22 25 207:25 242:9		Kale 227:19 229:24 233:9,15
investigative 49:5		Kenneth 32:18 104:8
investigator 208:2 214:12 227:24 231:10,13 234:22 238:14		key 18:23 19:16
invited 24:14		kill 85:8 87:17
		killed 81:15 83:18 84:17
		kin 243:16

kind 26:2 32:6 38:19 124:16 192:22 236:8	222:3 223:7	lieutenants 51:24
King 93:4	laws 78:19,22,24 79:2,15,17 80:7 83:84:25 88:13 203:13,19	life 85:1 87:1 96:25 105:15 116:21 133:21 192:14
knew 24:23 47:4 54:25 56:23 62:8 112:13 138:3 168:3 194:1	lawsuit 216:6 230:18	light 102:18
knock 146:23	lawsuits 23:15 215:1,9	lights 87:15 114:1 116:12 117:21 118:1,3,6,12,21,23 121:1,7,12,14 128:9,13 129:6,12,18 130:2,4,6,8,10,13,15,17,22 131:4 135:13,16 165:15
knocked 146:21	lawyer 210:18	likelihood 69:12
knocking 144:8 147:10	lawyers 218:5 222:11	likes 103:6
knowing 50:22 112:5	layers 13:17	Lil 192:12
knowledge 49:16 68:14,19,21 70:9,13 74:19 81:23 83:2,5,13 90:24 107:10 127:19,21 165:5 194:6 195:16 199:15 205:20 227:12,15,16 231:6 244:7	laying 181:11	limit 51:5
<hr/>		
L		
<hr/>		
L-A-T-W-A-Y-N-A 32:7	lead 241:6,9	listen 194:1 199:19
L-I-L 192:12	leadership 220:15 239:6	listening 91:22
L.D. 101:23	leads 109:3,6	live 10:17 57:15,16
Ladder (ph) 5:8	learn 161:19	lived 27:4 138:19,21,24
Laden 194:19	learned 220:11 222:12	livelihood 204:6
lady 44:18	leave 109:8 111:12 173:13,14,15 225:226:5	lives 85:1 87:1
lag 128:19	leaving 19:8 108:20	living 31:18 192:14
laid 48:10 241:5	led 60:3 155:7 213:18 241:2	LLC 212:3 215:17
lane 51:1 119:19,22,23	left 17:25 48:12 85:4 86:23 92:15,16 111:15,18,22 119:19 123:9 180:23 187:12 214:25 228:15 230:1	Lloyd 26:1 58:5,6 173:22
language 88:23 89:5 190:19 191:17 194:15 195:3,4,13,20 198:6	legs 163:1 164:19	located 111:14 198:25 221:10
laptop 133:12 153:25 186:12	lessor 14:8	lock 93:18,19 94:7 149:10
large 91:8 125:25 202:15 243:4	let alone 123:17 242:9	locked 94:10 111:24 149:12,17 152:3
late 15:22 19:10,11 63:7 141:23,25 144:7,20 147:8 177:12 195:25 241:11	letter 66:21 69:9,11,12 177:19 178:6	locking 149:14,20 152:14
Latwaynal 32:7	letters 178:9	log 154:6,8 186:14,16
Lauren 53:15	Let's 90:9	long 48:4,11 52:11 73:25 76:9 77:9 78:7 105:18 106:25 109:21 116:22 117:12 119:6 128:15 134:24 135:23 149:6 150:12 152:16 161:1,11 162:5,8 165:24 167:14 170:24 194:23 201:9,25 207:7 209:20 236:5
law 9:22 11:17,24,25 12:1,6,9 13:6,8 36:8 53:22 55:4,16 60:8 77:16 79:7 98:143:19 147:5 158:6 159:19 160:23 161:20 168:16 182:3,18 204:7,11,15 212:7 216:8,9 226:5 230:1 236:24 237:17	level 13:9 37:5	longer 32:17 49:8 59:19 76:13,14 78:10 118:10 165:13 189:7 190:6 214:6
lawful 169:1 183:18	liability 157:19	looked 22:21 28:13 66:19 117:25 119:13 120:3,24,25 224:16,18
Lawrence 33:4 35:3 64:14 68:17 104:10 180:2 188:19 195:17,19 196:10	lie 208:7	lookout 62:20
	lied 104:9,13	
	lies 109:11	
	lien 8:13	
	lieutenant 25:25 26:1 34:21 60:5 62:7 11 63:21 82:6,11 88:8 89:21 92:20,22 104:11 108:14,16 109:25 111:2,7,17 112:17 122:18 171:21 172:22 173:15 175:24 176:6 179:21 180:7,21,24 181:20 188:2 189:1,9,21 196:11 197:23 217:4,20 219:12 220:21 234:19,25 235:1 241:19	

loosely 91:12	makes 174:1	materials 37:8 38:14 161:21
Lori 243:3	Makin 69:20 70:3,5 71:5 72:2 73:8,11 74:11	matter 8:6,16 78:18 83:8,10 88:20,23 128:24 136:10 150:17 154:22 184:20 203:12 204:5 214:19 215:25 226:9
lose 77:10,13 176:8,12	Makin's 70:6	matters 173:17
losing 176:19	making 49:21 74:10	Mcgurl 9:6,11,12 10:20 97:15,17,18,22 144:25 145:4
lost 31:20	male 42:8 54:17 137:6 140:21 191:24,25 197:3 220:8	means 12:18 95:13 171:2,10 195:12 205:13
lot 33:19 48:9 90:20,21 95:17 106:7 114:2 143:6 150:3 160:4 196:14 228:21 235:25	males 239:15,19	meant 28:2 113:8 133:10 192:9
loud 180:22	malicious 212:20	measurement 39:10
Louisburg 18:14,25 33:23	man 25:2 42:9 44:18 46:4 57:5 82:17 91:4,9,16 93:9,12 94:9 110:5,22 112:21 114:23 147:10 192:19 219:19 238:21,22	mediate 114:7 115:23,24
lounge 56:20	man-to-man 13:17	medical 39:8 163:6 164:16 171:14
lower 153:3 162:11	management 87:11 104:15 107:13 123:14,18 163:21 164:3 206:14 219:18 221:13 222:14 228:18 239:6 242:11	meet 179:22 181:1
Luckily 120:2	manager 28:21 214:13	meeting 221:4 222:11
lunch 55:24 56:14,16,17 57:14 74:24	managers 16:24	member 180:6
Luther 93:4	maneuver 151:2	members 21:8 44:4 53:21 75:21 175:6 220:15 224:24
lying 224:25 225:1	manipulation 22:25	memory 54:9 81:24 140:12
lyrics 192:13	manner 8:20 131:23 195:14	mention 15:14 16:4 58:19,20 88:14,15,19 190:2 201:7,12,15,17 216:12
M		
mad 189:19	manual 38:17 41:18 162:6,18	mentioned 5:11,16 17:25 19:22 25:23 26:8 27:20 35:18,23 43:7 47:23 49:15 54:23 59:10 65:10,18 68:22 71:5 72:6 84:16 88:17 95:15 128:18 141:17,20 142:4 143:3 154:14 187:6 190:3 193:12 194:13 223:13 232:24
made 35:6 68:9,24 71:7 100:18 103:4,5 11 123:14,15,18 124:6 149:17 155:23 157:9 172:25 174:19 196:21 198:14 217:9,10 221:12 222:1,4,8,16 229:15 230:17 237:23 238:4 241:21 244:11	March 23:12,13 117:5 126:9 127:11,13 18 211:5	merits 80:18
magistrate 46:2 80:15 138:8 150:20 164:25 172:17 237:10	Maria 26:21 93:5 166:25 170:6	messages 57:1,3,8
Magistrate's 80:14	Marin 32:9 62:25 66:14,22 76:1 92:12,19 93:2,7 108:3 109:10 112:18,20 113:16,17,18,21,23 114:3,14,18,21,22 115:21 116:8,11,18 143:8 217:17 240:22,23	met 21:2 26:20 55:10 66:5 177:11 181:3 197:12 222:14
magistrate's 55:2 184:4 237:2	Marin's 63:18 68:5 217:12,16	methods 13:24
mailbox 198:15,25	Mark 120:23	Mexican 219:10 220:8
mailboxes 199:7	marked 21:11 22:2 87:22 89:9 98:4,7 101:3 104:5 107:22 120:13 125:3 126 169:22 204:12,20 209:12 224:1 225:4 232:5,9 235:3	Mexican-hispanic 18:24 219:1
major 35:14 49:11 51:25 78:5,6 86:16 17,18,19 87:5,9,10,20 96:22 97:5,6 105:9,14 133:1,3 134:12 135:7 136:20 137:16 185:3 231:14	markers 154:13	Michael 9:6,11
majority 105:23	Martin 93:4 191:24 192:2 193:12 194:4,14,17 220:21 221:2,15 223:23 238:13	mid 177:11
make 14:22 64:6 71:17 78:15,17 86:21 99:5 102:15,21,23 104:22 108:17,21 112:18 144:7 146:1,7,16 168:17 172:6 194:20 195:9,11 213:6 214:9 226:15 237:23 238:17,19	Martin's 99:18	middle 10:7 90:10 103:17 105:5
	master's 12:11,16	midnight 170:21
		miles 116:3
		mind 38:2 86:9 131:17 144:12,13 179:14 208:10 223:6 233:20

minimis 14:11,14	multiple 50:7,13 52:6,20 85:2 88:25 122:6 130:14 132:23 134:8 143:14 168:22 182:8,9 185:20 186:18 195:25 221:1,3 231:20,21	non-sworn 99:5,8
minor 42:5 49:11 75:25 76:1,3,21 87:7,8 95:2 117:7 134:9	mumbled 135:21	noon 144:19
minorities 220:2 239:15	munition 13:19	normal 72:13,19 76:15 151:25
minute 119:8,9 165:12	munitions 58:8	north 10:17 11:6,11,12 18:1 20:1 50:25 55:6 116:14 135:1 154:7 186:15 203:19 212:3 243:4
minutes 38:4 73:23 97:19 188:14 236:7	mute 9:7 124:10,13	northern 84:24 86:12
miscellaneous 99:8		notarized 27:1
misdemeanor 42:3 143:14 184:2		Notary 243:3,24 244:15,23
misdemeanors 336:24	N	note 125:19 203:3 245:4
misquoting 71:20,22	named 226:10 244:18	notebook 202:6,8,9,11,12,20 203:8,12, 17,21,23 204:1
missing 31:17	names 49:5 117:1 142:15 154:8 228:17, 18	noted 124:20 126:25 244:10
mix-up 185:7	naming 226:1	notes 40:2 203:2
mocking 192:3 193:17	nasty 110:1,16 112:23 217:6,20,24	notice 21:17 134:1 145:2,8
model 133:15 185:23	nature 41:17 57:5 221:19	noticed 117:14 149:9
modular 138:25 139:4,6	NC 78:3 215:16	notwithstanding 44:2
mom 44:5,8 94:2	nearby 139:4	November 18:3,15 19:10 42:23 59:25 72:11 107:9 160:20 217:12
moment 210:5	necessitated 26:1	Ns 192:14
month 99:3 101:17 193:9	neck 163:1	number 21:11 22:2,5 53:9 80:12,16 87:22 88:2 89:9 98:4 100:21 101:3 104:5 106:12,14,19,22 107:22 120:13 125:3 126:2 128:16 135:2 169:22 186:11,13,14 17 204:20 205:9 207:19 209:12 224:1 225:4 232:9
months 12:8 42:12 92:10 110:11 175:23 190:24 204:9 205:23 207:4,10,12 234:8	needed 16:6,7,25 26:17,23,24 27:1 28:19 37:1,5 59:19 105:8,21 189:7 190:8 8 213:13 214:6	numbered 243:13
morning 141:23 142:1,7 144:8,19 179:22,24 180:8	negative 92:5 204:11 226:23,24 227:1 229:8 235:19	numerous 40:8
mornings 144:20	negatively 225:23	
mother 43:12,18 44:17	neighbors 139:1,3	O
motion 93:24 225:7	Nicholas 234:22,23	Oath 8:14 27:16,18 183:13
Motor 49:2	night 69:25 87:16 117:20 128:1 139:25 140:2 141:11,23,24,25 142:1,7 143:15 144:7,9,19,20 167:23 170:18,20 187:9 240:17,22,24	object 31:23 38:18 71:18 124:16 129:20 146:10 226:7
motorist 51:9 118:20	nights 61:18	objected 124:17 126:24
Mount 11:11,12,13,16 17:25	nighttime 87:8	objection 39:7 71:10,18 126:25 144:25
mouths 97:4	noise 69:12	objections 8:19 145:7 146:7,16 226:16
move 26:22 76:22 98:7 101:5 105:19 125:23 132:6 138:9 210:23 212:11,19 237:14	non-attorneys 31:5 200:10	objective 13:9 182:18
moved 31:18 92:11 203:22	non-compliance 5:5	obligated 175:1
movements 108:21	non-compliant 5:9 150:25	obligation 242:8
moving 25:13 39:13 52:22 78:2 107:24 115:19 131:7 218:22 220:10 221:10 241:16	non-cooperative 5:9 150:25	
multi-colors 99:20		

obligations 79:7,9,16	160:1,2,9,12 164:10 168:16 179:16 207:8	ordered 241:23
Observe 19:1,13	205:23 212:2 219:4 230:1 233:23 237:8,11,17	orders 96:4,6 169:2 183:18
observed 84:23 95:3 132:23 190:25	officers 16:25 61:20 79:7 147:25 150:5	ordinary 137:15
observing 32:10	160:22 196:15 236:24 241:6	orientation 37:12,14 38:20,24,25 39:1,3 65:17 88:19 89:6 102:10 201:17
obsessed 182:19	offices 109:4	originator 63:5 67:3
obtain 210:2	official 89:12 100:22 171:15 179:16	Osama 194:19 223:21,22 224:13,15,17,18,20
obtaining 212:9	officials 228:17	other's 56:15
occasions 121:16,20,23	Olive 11:12,13,16 17:25	outcome 184:10
occur 207:14	Oliver 132:7,8,9,11,18,19 135:14 136:17 138:3 147:14 156:25 157:22 159:6,10 164:12 167:16 170:4,6 171:7 178:22 179:3,11,24 180:17 181:10,17,19 182:19 183:17,22 184:14 185:12,18 186:3 187:4 190:2 206:12 207:14	outstanding 38:2 185:25
occurred 20:4 42:21,22 46:25 111:16 170:8,13 177:7 187:23,25 194:8	Oliver's 134:1 138:11 146:18 184:25	overrule 174:13,16
occurring 170:10	on-boarding 7:9,10,12 38:16,19 42:15	o'clock 117:20 181:5 188:14
October 132:8,13 147:18 159:10 167:17 170:14 178:21 207:15,17 221:23	on-the-job 32:3 38:25	<hr/> P <hr/>
off-duty 56:24 57:2 188:16	one-lane 119:21	P-A-R-H-A-M 3:16
off-record 155:11 209:16	one-sided 175:12,19	P-A-T-E-L 194:18
offence 237:7	one-year 230:3	P-R 194:18
offended 203:8	one's 62:21	P-U-R-A-V 194:18
offender 184:22	ongoing 205:21,24 206:2,10,18	P.C. 46:6
offenders 18:12	online 27:3,5	p.m 233:5
offensive 88:22 89:5 195:13	onward 198:18	p.m. 70:22,24 74:23,24 75:1 97:21,24,25 98:2 124:12,24 125:1 127:22 144:5 145:22 155:10,13 165:2 170:16 186:25 187:2 188:13 233:5 236:12 242:21,23
offer 26:15 215:20,21	open 62:16,17,19 147:10	PACER 215:12
offered 26:11	open-eye 213:15	pages 28:15 39:25 98:9 99:7,12 202:18 211:15 243:14 244:5,8
office 8:7 15:22 17:6 19:21 22:19,24 24:19,23 27:16 32:3 33:14 34:16 35:17 36:7 37:17,20,22 38:15 39:5,12 40:10 41:12,18 42:1,4 43:2,24 45:7 46:11 49:21 50:17 52:10,16,23 54:24 56:6,9,17 57:21 62:8 68:16 80:14 96:12 98:16 99:17,18 100:13 101:20 102:6 105:11,16 109:9 111:14,18 112:1,4,6 131:10 136:16 153:22 154:2,4 155:2 157:21 159:12 163:18 164:24 178:17,19 180:17 182:18 186:1 187:11,12 188:17,18,20,22,24 189:24 190:18 195:6 199:4,11 200:22 201:12 202:5 204:3 207:8 211:2,8 212:5 213:11 214:5,25 215:14 216:6,14 222:13 224:24 227:4,9,13 230:2,10,19 231:13 21,25 232:17,21 233:22 237:20	opened 61:22 189:3	pain 166:7,14
officer 11:18,24 13:6,7 14:22 18:8,15 19:11 32:14 36:9 41:22 48:21 49:18 77:16 78:4 102:15 113:7,8 143:20 144:15 147:3,5 148:2,10 150:7 159:18,19,22,24	operations 84:21	panel 29:25 30:5
	operations 41:15 85:16 202:24	panic 164:15
	opinion 134:9 145:20 208:11 220:5	panicked 131:23 164:14
	opinions 239:25	paper 28:17 58:17 85:10 202:19 238:9
	opportunity 29:11,21 30:15 61:14,16 21 90:6	papers 46:16
	Opposing 145:25 146:3	paperwork 31:14,17 33:19 81:1,7,14 115:25 173:19
	options 157:5	paragraph 88:1,3 90:10 91:6,7 94:23 96:2 103:18 105:6 155:20 170:24 171:1 220:10 221:10 225:11,17
	oral 25:14 29:24 30:4 238:3,4 242:3	
	orally 30:16 41:25 82:14	
	order 10:3 73:24 184:3,4 186:9 237:2	

paragraphs 70:23	perceptions 44:11	physically 8:10 72:18,19 108:18 153:7, 8 162:2
paramedic 66:2,5,9	perfectly 139:10	pick 140:17 141:2 142:22
paramedics 51:4 165:12,23,25 169:1	perform 103:20	picture 154:9 172:19 219:21
Parham 26:21 73:16 93:5 167:1 170:6	performance 82:20,22 34:7,12 66:11 99:10 100:6 198:19 218:10,12,16,17	piece 112:24
park 148:21	performed 92:12	pinpoint 132:2 157:7
part 15:2 16:1,8,12 37:8 38:16 46:17 84:24 85:15 86:11,12 95:25 103:12 105:17 110:3,7 122:23 161:21,22 171:1 188:15	period 107:3 142:6	pitch 87:15
part-time 19:19 188:16	perjury 8:17 42:17 137:21,22 163:11	pitch-black 28:1
participating 9 10:12	permission 211:9	place 10:15 28:19 59:4 68:7,15 73:15,24 121:14 129:13 143:7 152:11 156:21 157:24 181:12 183:15,23 198:16 206:21 208:22 213:13,16 214:14 221:7 227:4,15 243:8 244:6
parties 8:18,23 36:7 212:13 243:17	Perquimans 1:5	placeholder 25:24
party 82:17 140:23 177:1,2 180:6 226:2	Persall 73:11	placing 162:10
pass 119:17	persecute 241:19	Plaintiff 22:5 225:22 226:3,5
past 75:16 124:6 174:9,17 199:13	person 8:14 15:1 23:3 55:1 56:12 71:6 80:21 107:11 109:15,24 121:13 135:4 145:21 173:16 181:24 182:14,15,17 186:19,21 202:3 217:23,25 237:2,4,8	Plaintiff's 225:20
Patel 190:24 191:16 192:4 193:17,18,22 194:13,18 223:14 224:11,13,25	person's 25:18	plan 218:4,5
path 168:14	personal 8:22 19:16 56:1 66:10 73:5 75:24 134:15 136:14 199:8 203:2 218:17	plans 179:3
patrol 32:24 33:1 34:15 35:4,12,16 59:21 64:14 78:4 84:24 103:7 108:13,14 109:2,5 110:15,25 111:18,19,22,23 132:23 151:24 154:24,25 155:15,17 173:23 190:10 199:2 200:24 221:16	personality 92:24	plate 132:24 133:11 134:25 135:1,2 184:9 185:6
pause 127:3 128:5	personally 132:15 231:23 244:18,20	play 58:19 112:21 127:1 128:2 194:3
pay 77:19 240:6	personnel 20:24 37:11 39:23,24 40:5,6 67:18 98:21,23,25 99:1,14,17,24 100:4,5 101:18 102:3,7,8 199:5 203:11 210:17,20 211:10 212:4,25 214:8	played 201:7
PC 85:24	persons 165:11 218:24 219:1,14,16	plays 128:4
PDF 40:19	pertains 102:13	pleasant 158:19
peace 13:10 14:2	pertinent 43:4	pleasure 175:15
Pearsall 73:11	Peter 22:6 25:1 57:24 195:2 221:23 223:2	point 28:3 31:24 42:18 51:4 80:1 86:25 107:17 108:21 115:9 118:11 138:6 145:12 157:6 164:11 165:16 166:11,24 183:21 196:2,3 226:11
penalty 8:16	ph 69:20 73:11	pointed 79:21 103:18
people 45:23 52:4,23 54:8,22 60:7 64:22 76:12,13 83:19 84:17 90:13 92:4 97:4 115:6 137:11 139:8 142:15 143:4 153:13 154:8 185:24 191:16 192:8 217:14,20 219:10	philosophy 133:14 185:23	pointing 103:21
people's 85:1	phone 27:6 57:6,7,8 72:15 73:5,7,8 82:15 91:19,22 109:15,24 110:1,14 112:15,22 114:4 173:11 179:22 187:7,9 216:15	points 26:4 97:17
pepper 13:19 15:11,12,14,16,17,19,21,23,25 16:1,4,8,11,15,17,18,20 17:5,12 157:14,17 158:11,21 159:7,9,15,23 160:2,12 161:7	phonetic 54:12 71:6 106:24	police 13:6 16:24,25 50:3 55:11 135:13 147:3 160:23 164:18 212:1,2,3 214:13 215:16 227:17 229:24
perceive 158:9	photo 154:12	policies 37:15,16,19 39:3 40:10 41:25 43:1 47:21,25 49:14,19 195:25
	physical 14:9 169:2,9	policing 133:14 185:22
		policy 38:17 39:4,11,17 142:18 157:19 158:9 206:7

Pool 54:7,25 221:17	print 154:1	protected 176:25 177:18 178:10 181:15 215:6
Poole 57:11,25 58:11,18 91:22 104:8,18 108:15 111:1 112:15,20 113:18,21 114:19 115:15,16 116:4,15,18,20,22 188:3 191:1,6,8,13 200:11 201:7,20,22 220:22 221:16	printed 154:3	protecting 13:10
Poole's 116:21	prior 21:16 24:18 67:25 72:5 130:4,6 156:11 157:5 190:24 191:17 238:5	protection 175:17
pop 73:19	priority 95:1,6 103:5	protective 98:10
portion 198:3	prison 33:21	protocol 158:10
position 18:25 22:20 24:14 27:17	prisoners 160:17	protocols 158:9 169:8
positions 14:10	private 45:19 202:3	provide 8:14 17:15 28:25 36:24 51:9 78:19 157:21 163:8,15 167:6 182:14 217:19
possibility 118:7	privilege 226:8 230:25	provided 16:23 17:7 21:1,15 32:23,25 34:8 37:5,16,18,20,22 39:3,6 41:19 62:6 89:20 116:6 121:6 135:12 202:8,9 240:12
possibly 17:17 40:9 71:6 171:22	probability 67:22	providing 39:17 235:19 240:2
potential 26:24 212:23	probable 52:8 80:19 237:13,14,15	provision 79:12
power 78:17	problem 36:5,9,11 61:19,23 66:9,24 67:1,2,20 175:14 220:1 228:6 234:9	provisions 37:25
practice 81:11 96:2	problems 34:23 62:22,23 64:18 74:4	provocative 11:8
practices 41:25 42:3 43:1 49:14,20	Procedure 146:6,15	proximal 71:1
praised 95:22 218:10,11	procedures 37:15,17,19 42:3 47:22,23	proximity 139:2
precedes 100:11	proceed 229:18,19	public 12:14 13:1,7 18:2 20:2 87:6 105:10 114:5 115:22 160:13 163:9,23 179:16 243:3 244:15,23
predated 175:23	proceeding 8:10,11,12	publicly 215:10,11 216:3
preparation 20:16 21:6	PROCEEDINGS 1	puff 199:21
prepare 20:10	process 12:3 24:9 26:15,19 29:23 37:9,10,12 38:17,20 39:1 41:7 42:15 53:23 60:5 79:24 80:10 151:23 156:24 175:16 212:19 238:14	pull 48:13 51:2,6 69:2,5,6 80:16 97:6 120:15 133:13 134:23 149:13 185:21 189:12,13 204:17 209:10
prepared 10:21 20:12 166:25	processes 38:21,24	pulled 33:14 48:14,17 50:6,13,14,15,18 66:19 85:6 87:13 121:8 149:15 162:6,19 166:4,19,22 189:10
presence 13:18,25 102:19	processing 164:25	pulling 48:16 52:4 95:14 113:23
present 8:11,23 9:12 21:5,8 28:8 72:18,19 169:24 189:24 237:9	produce 126:16	Purav 194:18
presentable 27:11,25	produced 126:10	purple 198:15,24 199:17,19,21 239:10
presented 28:11 29:11,18,20 30:14 122:11	production 22:7	purpose 60:11 64:22 210:19 232:14
preserving 13:10	professional 7:10 74:9 136:4	purposes 14:4 16:3 24:21 101:8 202:21,22 203:5,10 212:8 244:21
pretty 10:1 48:10 112:24 134:5 161:10 163:20,24 165:6	prompted 184:24	pursuant 76:15 226:4
prevent 14:2 180:15 204:14	pronounce 96:6	pursuit 136:5
prevented 225:22 226:18	proof 227:8,11 233:10,16,18	push 154:24,25
preventing 185:15 235:12	proper 157:18 208:7 214:8	
previous 23:15 24:3 79:21 91:1 96:4,6 215:1	property 45:19 147:19	
previously 24:6 30:14 33:22 34:11 78:91:2 98:7 106:5 117:10 144:17 149:23 185:1 214:17 228:4 234:3 240:1	prosecute 241:20	
	prospective 226:25 227:10,13 229:22	
	prospects 207:25 225:24 226:19	
	protect 87:6 96:24 105:15	

put 46:1 63:4 68:2,4 85:1 90:25 91:1 92:10,13,24 94:3,4 115:25 116:21 119:3 121:25 123:13,16 133:21 134:5 150:19,22 153:2,11 162:19 185:12,17 238:8 239:8	re-certified 229:25 230:5	recommend 21:17 122:9,22 150:19
putting 87:1	reach 216:2	recommendation 22:13 168:18 174:10,17
PVA 135:18	reached 24:11,12	record 8:4,22,23 10:5 20:12 38:9,12 53:20 70:21,24 74:13,21,23 75:1 97:13,24 98:2 100:10 124:12,21,23 125:1 136:22 155:8,9,12 163:9,24 165:1,2 184:15 186:22,24 187:2 215:24 233:4,7 236:11,14 243:14 244:5,8
Q	react 33:13 118:15 136:3 152:20 164:13 191:6	record-keeping 101:8
question 23:17 31:25 39:6 52:1 63:7 65:13,15,16,23 82:12 90:17 93:2 99:23 110:20 114:23,24 129:21,23,24 130:11 20 145:11,14,18 146:4 147:13 151:22 159:3 191:14 196:25 197:4 205:16 208:9 211:19 214:18 218:6 223:1 226:14 233:13 235:19 240:3	read 29:1 37:24 90:2,3 167:14 171:5 244:4 245:8	recording 122:15 132:3 133:8 134:23,24
questioned 17:11 120:24 188:8	reading 88:4 170:22 185:5 243:20 245:3	recordings 122:15 163:22
questions 26:2,5 27:6 33:7 75:3 123:4 131:16 188:9 190:7 218:18 233:2,8 236:6,17 242:17,19	ready 60:7,13 120:20	records 66:19 74:15 99:21 211:22 215:10
quick 185:3 231:17	real 75:10 77:8 166:8 242:15	recruiter 210:2
quickly 70:16 85:22 118:25 119:4,5 137:14 138:1	realize 82:16 157:2	recruiting 233:23
quiet 189:23	reason 11:20 31:16 34:4 43:17,18 52:8 57:22 59:21 64:16 94:11 103:20 105:25 106:1 127:20,23 129:5 171:12 190:13 200:17,18 215:19,22,23 216:3,4 220:4	rectangular 202:16
quote 179:21	reason(s) 245:5	red 102:18
R	reasonable 147:9,12 213:6 214:12	redirect 236:8
race 26:8 65:9,17 88:14,15,16,17 177:17 195:9,21 201:7,12,13 217:21 219:24	reasons 75:10 113:5 134:15 239:20 241:10,20	reduction 150:20 168:18
racial 88:22,24 190:19 191:22 223:16,19	reason's 44:10	refer 84:21 85:16 146:5,14 149:3 152:17 161:24 195:1
racism 203:15	recall 16:8 21:22 23:19 26:6 30:22 51:10 52:19 54:1 81:19 104:2 105:17 110:7 131:25 132:25 134:6 146:20,21 147:1 170:10 176:11 194:23 195:4 196:20 236:4	reference 26:24 27:1 43:10 104:25 108:8 110:21 113:10 120:23
radio 48:18 50:20 63:15 95:20,23 107:18 114:4 115:22 116:11,15,17 132:4 135:7 184:9 185:4	recalled 49:16	referenced 158:10
radioed 132:24 133:10	receive 32:3,6 81:1 85:10 237:4	references 204:12 226:23 227:1 229:8 235:19
Raleigh 11:11	received 32:8 43:11 47:23 100:24 126:15,23 148:3 178:25	referencing 224:17
rammed 238:21	recently 232:4	referred 34:15 54:16 161:25 194:17
ran 230:3 242:13	reception 23:1	referring 35:20 36:1 37:11 42:16 78:23 82:8 83:3 91:17 92:4 104:13 108:7 113:12,14 156:1,16 175:20 178:13 180:1 3,9 218:9 224:19 227:1 234:12 238:1 240:7
rang 112:15	recess 38:3,10 70:22 74:24 97:25 124:24 186:25 233:5 236:12	refers 114:6 133:1
Ray 54:11 173:13,14 188:19 241:4	recognize 89:18 210:25	refresh 140:11
Ray's 61:24 67:23	recognized 56:7 112:12 239:14	refusal 124:5
	recollect 194:11	refuse 36:10 123:10,12
	recollection 52:12,17 103:23 165:5 194:7,8 207:13	refused 123:5,8,11 124:2,18
		regard 118:17 187:5

registration 134:19	replied 111:3	respectful 217:5 218:1 239:22 241:5
regret 109:10 183:10,11	report 19:1,13 37:2 41:14,15 44:16,17 84:21,22 85:16,17 117:13 125:11,12 134:4,16 138:17 140:9 149:4,5 150:13,19 151:18 152:17,18 153:2,11 158:5 172:6,15 173:12,13 202:23,24 204:12,24 208:19 226:20 228:20 234:4,5 238:23	respond 36:14,18,19,20 48:8 82:24 90:7 192:24,25
reimbursement 132:13,15		responded 132:2 167:8 191:13
reinstated 24:6 33:22		responding 13:24 131:8 219:3 241:13
related 72:1 126:15,18 181:7,9,13	reporter 8:3 9:2,5,9,13 10:4,11 21:14 38:8,11 70:20,23 74:22,25 97:23 98:1 124:11,22,25 126:5 127:1 155:9,12 186:23 187:1 225:12 232:5 233:3,6 236:10,13 242:20	response 22:6 136:3 150:16 178:10 242:7
relation 148:21		responsibilities 8:10,25 19:12 34:17 35:19,20,21 77:11 185:14
relationship 56:1 64:18 65:25 70:6,8,9 74:6,9	reporting 8:12,20	responsibility 34:18 120:1,4 129:10,15 169:20
release 209:5,8,21 210:17,19 211:1,6,12 21 212:4,11,14,17,22,24	reports 49:6 50:16 52:10,16 100:22 138:17 140:5 149:4 151:16 163:4 165:15 167:15 170:18 176:9	responsible 68:15 114:15
released 212:24	represent 9:21	rest 92:3
releases 212:8 214:15 230:4	representing 15:25	restorative 2:22
releasing 213:2	reprimand 81:17 89:12	restrict 180:13
relied 162:20 163:13	reprimanding 1:19	result 116:14 168:11,19,21 205:17
relief 76:3,7,15,18 209:8	request 15:23,25 106:20,21 126:15 139:19,22 183:18 214:8	resulted 151:1 242:4
rely 52:10 150:12 162:18	requested 15:24 16:13 101:18 139:20 140:16 222:21 243:20	retail 19:19
remain 57:10	requests 22:7 126:14,18	retaliation 181:13 216:5
remarks 221:12	require 14:3	retaliatory 181:14
remember 20:3 22:25 23:11,18,24 24:1,3 26:2 27:21 28:13,23 29:3 30:6 31:6 39:16 40:11 42:20 43:2,5,9 50:24 52:4,12 53:13 54:3 73:6,7,10 74:5,10 84:12 85:13,18 91:3,10 103:21,24 105:12,13 106:3 108:6 109:20 111:5 113:1 117:5,7 17 118:11 127:9,12 131:8,13,15,24 132:5,20,22 134:17,22 135:3,6,15,16 136:1 138:13 140:9,15 149:1 161:4,5 162:9,10,13 163:4,6,12 164:8,9 165:8,10 18,22 167:3,7,8 170:15 171:22,24 172:1 176:5,7 184:17 188:6 195:23 197:6,7 199:22 202:1,17 203:10 206:25 216:2 223:19 225:1 236:2	required 79:8 86:16 157:20 182:1 189:7 215:15	returned 136:15 200:5
remembered 73:18	requirement 11:24	revealing 20:8,13
remembering 6:7	reread 127:15	reverse 119:3
remorse 76:19,21	rescinded 197:10 215:20	review 20:14,16,21,24 24:16 25:14,23 26:9 29:24,25 30:4 37:7 38:16 39:15 41:11 69:7 74:15 80:16 89:14 98:8 99:1,13,24 101:6,18 104:20 107:25 120:16 125:7 169:25 204:23 210:5,13,21 211:17 213:5 217:2 224:6 225:18 232:6 237:11
remote 9:13	residence 10:16	reviewed 20:15 38:14 39:23 40:13 41:10,14 98:22 99:13,16 100:25 210:8
remotely 8:12 9:5	resist 156:25	reviewing 40:9,10 105:3 173:18
remove 131:6 171:16 209:1	resistance 68:12 169:1,3,7,10	Riceland 25:19
repeat 65:16 130:20 135:24,25 151:22 184:21 233:13	resistant 153:13	ricochet 157:24
repeating 36:6 167:13	resisted 152:25 168:10 169:5 173:7 213:25	ride 59:21 189:16,20 190:9 200:24
	resisting 153:6,7,8 155:5 157:3 164:22 169:1	riding 48:14 52:3 75:18 217:17
	resistive 15:8 150:24	rights 98:17 136:11 175:16,17,18
	resources 28:20 37:11 98:19	

rise 226:2	S-U-T-T-O-N 35:1	sends 213:6,7
risk 133:21 143:22 144:23 145:19,23 157:25	S33 63:14	senior 45:12 54:17
risks 143:20	safe 49:25	sense 156:25
risky 143:24 144:4,6	safety 13:7,10 18:2,15 20:2 87:6 133:2 157:25 160:13	sentence 102:13 105:20 193:14
road 43:4 73:16 76:14 81:14 87:5 116:9 119:21 138:22	Saturday 86:1	sentences 121:15 122:10
roads 93:5	save 96:24	separate 61:3 94:15 102:6,8
roadway 121:2	scared 94:12	separated 62:15
Roberson 53:9 54:10,11,12 63:7,9,24 64:25 66:8 92:20 96:9,18 104:24 106:21 107:12 218:9,14 238:24,25 240:21,23 241:17	scene 14:24 123:14,15 150:6 165:10,18,19 167:3	separation 204:13,24 205:1,16 226:20 17234:5
Roberson's 60:24 107:7 240:13,15	Scheduling 88:3	September 18:3 99:2,3,16 101:17 107:8
Roberson's 4:16	school 11:4,5 53:23 140:19 141:3 148:156:5	sergeant 32:9,13,16 34:8,13 35:2 41:22 647:24 48:19 49:10,15 51:16 52:3,7 53:2,3,5,8,18 54:6,11,12,16 60:4,24,25 61:1,11 63:3,7,8,18,24 64:20,21,24,25 65:4 66:8,14 68:5,6 69:1,13 72:10 75:4,22 76:1,18 77:1,11 85:12 86:5 92:12,19 93:2,7 96:9,17 104:24 106:21 107:7,11,12 108:3 109:10 111:25 112:7,15 114:7,22 115:13,15 116:2,19,20 117:24 120:22 121:2 122:16,20 140:16,17 142:21 148:4 155:24 165:13 166:11 176:3,4,6 183:1,7 186:4 188:2,4 191:24,25 194:17 195:24 196:3 218:9,14,18 220:20 221:2,15 223:23 231:9 238:11,12,14,24,25 239:11 240:13,14,15 241:7,17
Robinson 9:3,4,13 31:23 38:1,6,18 65:4 70:15,19 71:10,16,20,25 101:7 123:1 124:10,14,15 126:6,10,17,23 129:20 145:12,24 146:2,8,12 210:4 226:7,13 236:7,16 242:16	Science 12:11	sergeants 51:24 52:2 191:21 218:10 221:6
rode 32:8,14 53:2 61:17 217:22	scope 226:11	Sermons 46:1
role 54:1	scratching 44:23 45:5	serve 41:16 50:5 80:2,20,21 81:4 85:18,22,23 110:16 139:18 141:6,15 143:21,25 144:4 145:21 155:25 156:6,8,11 181:23,24 182:13,21,22,24 183:5,8,12 184:1 237:16,18
roles 53:24	screaming 152:2 166:18,20	served 46:7 81:6 86:2 141:9,11,24 142:5,6,8,20 143:8,11,14,15 144:16,18,22 186:1
romantic 70:8	screen 21:15 112:25 125:24 131:7 209:2	service 59:19 114:5 133:25
room 8:11,23 10:18 25:24 82:17 108:15 109:2,6 110:25 111:12,19,22 199:2 221:16	scroll 21:20 22:10,13 89:16,19 90:9 98:11,12 211:25 225:12,15	services 58:11 132:2 163:21 164:2,16 182:7 189:5,6 190:5 200:23 214:5
rotated 76:11 162:12 240:16	scrolling 22:10	serving 13:9 46:15,16 49:21 90:12,23 91:5 110:19,22 111:4 181:19 183:10
rotating 162:17	SEAL 244:25	sessions 21:6
rotation 240:24	search 141:10,17,20 184:25	set 22:6 24:24 27:7 241:19 243:21
roughly 171:24 172:1	searched 232:23	severe 134:12 225:24
rude 110:1 217:6,20	searching 186:11	
Rule 146:6,15 222:11	seat 85:3	
ruled 226:9	seconds 115:11 119:9 127:16 128:16 233:20	
rules 9:14 205:18	secretaries 99:8	
run 45:24 134:18 196:16	secretary 99:19 109:3	
running 106:1	section 225:18	
	secure 209:4	
	securing 225:23 226:18 235:12	
	security 19:11 205:9 207:19	
	seek 16:20	
	seeking 214:19	
	seeks 226:3,5	
	send 16:25 57:1 125:25 134:24 209:5	
S		
S-H-E-F-T-A-E 4:21		

sexual 65:17 74:10 88:19 89:6 201:17	She's 87:17	signing 27:21 211:11 243:20
shaking 94:5	shift 32:10 48:2,20,22 53:21,25 54:8	signs 43:22 114:9
share 21:15 126:5 131:7 132:4	60:24,25 61:24 63:18 64:7 65:7 66:4	silenced 92:15
shared 125:24	67:23 68:5,6,8 70:2 72:10 76:1,2 77:12	similar 12:20 44:4 125:18,22
Sharika 9:3,12	107:7 113:23 114:3,16 122:1,6 141:2	simply 58:20,21 59:18 92:14,16
Sharon 26:1 34:20,21,22 35:3,7,9 36:2,13,14,15,20,22,24,25	142:1 143:15 144:18,19 167:23 170:20	sincere 34:2
19 173:15 188:20 189:1,9,21	175:25 198:12 217:12,15,16 240:8,9,12	sincerity 114:9
Shaw 11:10 19:8,17	shifts 78:16 240:16	singing 192:17,18
she'd 153:3	shit 141:4	singling 33:2
sheet 202:19	shook 93:23 94:12	sir 30:2 65:16 81:9 97:16 104:7 119:2
Sheftal 54:19	shopping 56:20	129:2
Shelton 231:14	short 201:25	sirens 114:1 116:12 135:16 165:15
sheriff 13:7 25:1,4,9 27:8,20,22,24 28:6,7 30:21,22 33:3,9,15,16 35:5 37:23 41:6	shortly 27:7,13 128:17 214:4 216:18	sit 173:2 174:6
24 42:2 43:1,11,14 44:19,20,23,25 45:2,4,5,9,14,17,22,25 46:4,9 47:4,13,17	show 95:20 114:9 137:6 153:15,25	site 45:17
51:19,25 57:24 58:9,10,25 59:3,7,20	232:4,6	sitting 9:23 76:13 116:7 188:20,22,23
64:1,2,5,8 67:24,25 68:12 78:3,14 79:10	showed 76:19,21 118:1 136:21 161:7	192:18 194:9 236:5
11,14 80:8 81:17 82:4 83:15,25 84:12,14	165:18 212:23	situation 14:1,2 36:20,25 76:8,10 84:2
15 87:11 96:20 99:18 103:13 104:1	showing 43:19 118:6 185:4,5	86:15 97:5 110:10 113:15 115:20 129:9
114:13,14 118:18 123:21 146:18 148:13	shown 26:25	139:21 144:15 151:10 154:16,18 156:15
15 163:18 172:24,25 173:4 174:1,4,8,12	shows 117:24 184:21	183:19 230:13 242:1
16,21,23 175:1,16 176:23 177:5 178:14	shot 92:14 115:5,6	situations 131:14
179:20,23 180:10 181:1 189:6,24 190:5	shut 241:12	skinny 137:7
14 195:2 196:12,22 197:7,10,12,16	Shutting 241:12	skip 127:2 163:2
200:23,25 205:2 206:8 208:7 209:5	sic 65:8 100:9 109:12	skip 127:2 163:2
212:24 218:23,25 220:12,14 221:4 226:1	side 61:25 81:13 109:2,5 115:12 138:2	skipping 22:4
233:22 234:18 235:2 238:7 241:24	149:10 183:25 186:15 242:9	slam 92:16 115:10 118:22
242:12	sign 22:14,15 28:9,20 29:19 89:25 90:5	slammed 178:2
Sheriff's 8:7 15:22 19:21 24:19,23	102:18 122:11 123:6,8,10,11,12,24	slender 137:8
28:18 31:19 33:14 34:16 35:17 36:7	124:4,5,18,19 197:16,17 209:22 211:6,16	slightly 120:19
40:10 41:12 42:1,4 52:10,16,22 56:6,9,16	212:8,10,18,22 214:17,19,21 230:4	slow 51:3 86:1 118:24,25 119:14
68:16 79:3 99:17 100:13 101:19 102:6	237:16	slowly 108:25
131:10 136:16 153:22 154:2,4 180:17	signal 86:22	slurs 88:22,24 190:19 223:16,20
182:15 186:1 187:12 199:4 207:7 211:23	signaling 93:24	Smile 192:13
212:5 222:13 226:6 231:21 232:17,21	signature 28:18,19 89:22,24 106:15	sneaky 93:9,11
233:21	123:13,16,21 205:12 207:19 209:24	snitch 62:21
sheriff-specific 9:15	244:13	snow 199:25
sheriffs 221:12	signatures 40:2 124:7	snowball 199:21
Sheriff's 17:6 22:19,24 32:3 37:17,20	signed 29:1 31:7 46:7 84:15 90:2	social 12:21 205:8 207:19
22 38:15 39:12 41:18 43:24 49:7 50:17	123:15,19 124:3 211:25 212:17 214:15	socially 9:1
54:24 57:21 98:16 105:11,16 157:21	significant 120:3	
159:12 164:24 174:9 178:18 190:18	significantly 35:15 181:13	
199:11 201:11 202:5 204:3 213:11		
214:25 215:14 216:6,13 224:24 227:3		
13 230:2,10,19 231:13,24		

soft 13:17,18 14:7,8,12,13,18,20 151:158:13 164:23	speed 51:5	starting 156:25 227:21
somebody's 86:24 105:15	speeding 52:5,13,18 86:25	starts 196:7
someone's 96:24	spell 10:7 25:18 54:20	state 9:16 10:5 18:11 34:18 78:6,7 88:13 101:8,9 116:6,23 160:15 203:13 208:10 214:21 216:10 243:4,9 244:16
something's 19:21	spelled 132:7	stated 34:11,13 36:3 44:11 47:13 50:12 57:24 58:5,8 99:15 109:16 110:14 117:1 120:25 140:2 162:10 172:23 173:12 183:1 215:23
Something's 2:12	spend 56:14,22 57:14 72:12	statement 9:1 33:12,13 90:18 92:10,13 95:24 96:10 101:12 104:14,24 107:15 108:3,11 109:8,11 110:8,9 111:3,10 118:3 121:22 122:10,11,22 124:18,19 130:7,16,19 132:11 183:4 217:9 218:13 220:19,24 224:10,12,23
song 192:11,17,18 194:11	spending 56:21	statements 26:24 27:1 90:7 97:8 147:14 198:14 222:1,4,8,16,18,19 223:4 238:11 239:24
sort 50:1	spent 72:17	states 220:11
sorted 45:7	spine 163:1 164:19	stating 8:21 129:7
sought 17:2	split 53:25 62:15	stationary 119:25
sound 60:1 100:21	spoke 33:18 42:8 84:3 105:7,20 107:13 112:23 187:6,8 188:1 202:1,2 228:16 229:15 235:7,22 237:22	stationed 117:3
sounding 151:20	spoken 42:12 235:5	statute 79:13 153:20
sounds 60:2	spontaneously 14:12 174:2	statutory 79:6,9,15
Soup 92:7,17,21,23,25 94:16	spray 13:19 15:11,12,14,16,17,19,21,23,25 16:1,4,8,11,15,17,18,21 17:5,12,17 157:14,17 158:11,21 159:7,9,15,23 160:2,12 161:6,7,8	stay 30:11 51:7 56:2,4 112:2
south 50:25 116:15 154:8 186:16	sprayed 17:18,19,20	stayed 56:24 77:13
southbound 1:1	spraying 161:5	stays 57:16
southern 12:12 27:2 86:11 116:4	squad 52:25 53:4,9,10,13 54:4 59:25 75:5,8,22 85:13 240:4	steady 157:23
spaced 139:7	squads 52:23 53:4	step 108:16 151:7
spare 80:17	square 202:16	step-by-step 162:4
speak 41:25 42:2 45:6 140:15 154:20 178:21 187:10 220:17 229:6,10	squirm 153:9	stepping 22:17 162:17
speaking 38:22 43:14 46:20 71:17 92:1 146:7,16 151:25 171:23 226:16	SR 53:24 54:1	steps 162:16
speaks 220:5	staff 25:5,8 175:6 180:6 220:15 221:3	stock 46:13
special 40:2 212:3 215:16 227:17 229:16	stand 183:4	stomping 92:15
specific 14:16,19 26:5 28:24 29:4 30:16 31:12 39:4,12 49:5 52:7,17 63:6 81:24 93:1 95:8 100:24 102:16 103:24 104:1 114:10 132:20,22 134:15 142:15,18 143:16 157:6 160:3 162:16 193:10 194:22 195:4 196:20 216:23 219:11,17,24 230:12,17,21,23	Standard 209:6	stop 10:24 48:25 52:9 80:24 81:25 82:1,9,18,24 86:17,21 90:23 91:4 102:17,18 103:21 105:21 106:2,12,13,14,18,19,22 110:22 111:4 119:10 128:10 183:22 184:12,24 185:17,20 233:11,17
specifically 15:25 17:7 49:4 91:25 96:99:20 100:2 165:7 215:17 224:16 234:13 239:15	standing 111:24 121:5 135:17 188:23	stopped 48:24 52:17 65:2 73:14 86:4,16 102:24 105:10 118:19,20 121:13 137:12 138:3
specifications 1:1 52:19	standpoint 44:14	
specifics 30:13 167:13	stands 205:15	
specifies 79:13	starred 39:20	
speculate 41:3	start 11:2 37:13 38:25 43:13 100:9,12 115:7 119:4,6 152:6,9 175:11 209:18	
sped 51:4	started 19:9 29:17,19 32:2,7 38:14,24 39:13 41:10,12 45:5 53:1 54:23 75:18 110:15 152:19 157:1,3,8 166:18 202:4 239:7	

stoppings 52:13 84:19 96:2,12,15,22 121:17,21,24 122:2	suing 179:14 180:13,14	swear 80:17 237:11
stops 48:19 52:6,20 86:14 100:20 102:14,21 105:9,22,23 106:7,9 107:17 122:4,7	summer 53:23 177:9 193:8,10,11 221:1	swearing-in 27:9
story 121:6	summon 236:25	switch 35:6,7 67:11
straight 151:2 162:21,23 168:24 214:3 22,23 111:4 184:3 219:19,21 236:19,22,23 237:5,7,9	summons 45:3 46:1,8 80:2,9,11,13,17 20,23 81:4,6,21 82:19 83:16 85:19 88:12 90:12,24 91:5 96:3,16 100:19 110:16,19 114:3 22,23 111:4 184:3 219:19,21 236:19,22,23 237:5,7,9	switching 33:5
stream 157:23	summonses 81:17 82:2,9 83:9	sworn 9:16 25:10 27:1,9,12 159:19 160:23 199:4,8 243:9
Street 131:9,15,22,25	super 114:15	symbols 199:17
strikes 14:11	superior 130:17	system 26:25 43:20 46:21 136:18
stronger 171:4	superiors 130:3,21,25	<hr/> T <hr/>
studied 11:15	Superman 236:1	T-E-R-R-Y 62:6
studies 12:12,15,17,19	supervision 66:6 239:6 241:2	takedown 151:2 153:4 158:11 161:19 162:3,7 167:10,19 168:24 214:3
study 11:14	supervisor 45:10,11 51:14,17 66:18 70:2 114:15 141:13,14 142:19 143:23,24 144:3 145:16,20 241:15	takes 68:15
stuff 31:15 40:19 45:7 49:7 67:4,13 97:9 136:12 143:7 149:6 150:3 198:16 235:25	supervisors 24:17 51:23 56:18 82:6 92:5 141:10 142:9 148:13 228:16	taking 35:7 38:2 41:10 91:25 151:7 152:7
stuns 14:11	supervisory 86:9	talk 22:18 32:1 47:21 55:8,20 57:18,19,20,24 59:17,20,24 64:5 67:23 69:2 72:14 77:5 81:16 90:15 91:16 92:5 96:11 109:7 14,23 110:6 132:17 133:15 147:17 149:16 157:4,11 168:16 185:22 187:4,14 189:22 190:14 198:24 201:6 209:3 211:12 215:16 216:23 228:11,24 229:3,4,5,10 234:19 235:20
stupid 48:12	support 184:2	talked 35:3 47:22 49:20,21,23 77:4,7,8 84:8 87:10,11 95:22 97:1,9 106:17 110:1 154:17 174:3,21 180:1,2 182:5 187:17,18,19 197:9 230:8 238:24 241:24
sub-development 38:23	supposed 83:20 173:7 175:3	talking 20:19 41:21 55:13,19 59:2 61:8 74:5 81:20 93:23 110:15 112:17 113:16 114:2 135:14,16 139:25 142:14 157:10 159:13 167:3 180:23 193:20,21 199:23,25 209:8 213:20 218:21 228:25
subject 113:10 115:19 156:19 168:11	surely 86:8,9,20	Tall 137:7
submitted 39:18 41:4 98:18,20 106:20 21 206:9	surety 226:6	tape 69:7 135:11 136:21 137:20 163:25
submitting 57:12	surrounding 6:4	tapes 69:5 163:8,10,16,19 164:5
subordinates 15:2	surveillance 18:9 128:23,24	tardiness 241:11
Subsection 218:8	suspect 87:3	target 219:24
substance 87:4	suspended 84:13 110:11 113:1,4 115:16,17 116:22 122:20 175:22	taser 13:20,21 18:19
substances 10:23	suspension 99:8 100:5 101:24 121:18 122:9,14,21,23 196:18 197:22 238:6 242:2	taught 15:12 41:15 94:2
substantial 97:1	suspensions 24:4 198:18	Taylor 231:5
substantiated 105:22,24 206:3,10,19 207:24 208:20	suspicion 52:8	
successful 25:16 30:6	sustaining 234:16	
sucking 238:22	Sutton 235:1	
sudden 40:17,23	swap 33:5 60:9,12	
sue 179:3,11 180:9,18 181:10 230:10	swapped 35:9	
sued 179:15,18 216:8	swapping 33:5	
suffer 204:4		
suffered 151:6		
suggest 70:18		

teach 161:6	testify 10:21 71:18 191:11	3,5,6,7,12,14,15,19 51:21,25 79:25 80:4
team 53:10	testifying 10:24	5 83:17 133:16,19 135:20,22 219:3,5
teams 52:23	testimony 8:16 71:13 80:18 116:7	220:6,8 236:19
teamwork 183:6,7	124:17 138:5 174:16 237:12 240:1	ticketed 220:9
technique 151:1 158:13 162:22,24	243:12,15,20 244:5,9 245:4	time 8:4 11:18 14:16,19 15:18 16:11,14
164:23 168:11,19	text 57:1,7,18,19	17:24 19:9 20:4 24:12,24 32:13 35:4
techniques 158:7	texts 178:25	38:9,12 39:23 41:23 42:18,24 43:6 46:10
telephone 24:13 114:6	that's 48:22 97:21 146:3 151:15 189:14	22 49:23 50:24 51:4 53:9,15,21 54:9
telling 59:14 79:3 90:14 97:11 115:2	199:10 223:6	55:8,10,20 56:14,21,22 57:14 60:6 66:19
146:2 154:19 174:22 180:20 213:20	Then-captain 25:25	70:21,24 72:12,17 73:4,18,25 74:11,23
219:25 227:13 228:4 236:4	then-director 89:2	75:1,19 76:9,21 77:9 79:7 82:21 83:7,14
tells 79:10	thereof 243:19	85:25 89:13,20 97:4,14 99:13,23 101:15
temp 80:12,15	there's 185:3	16 104:20 105:18 106:4,25 107:3 108:21
temporarily 158:3	they're 61:6 153:19 213:1 242:5	109:21 115:9 117:12,17,18 124:23 125:1
ten 116:3 121:17 122:9,22 160:4	thin 39:25 98:24 102:11	128:1 129:21 134:25 135:24 138:13,14,
ten-day 122:13	thing 19:15 66:15 97:11 99:22 113:17	16,18 140:3,10 141:11,12 142:6,12
term 92:17 180:12 192:17	133:19 144:16 157:22 171:2,11 193:18	143:16 144:8 146:4 148:1,11 149:6,20
terminates 58:10 187:11	197:2 206:4 227:6 236:20	150:12 152:17 153:21 156:17 159:20
terminated 24:6 33:1,22 39:18 57:23	things 16:6 27:5 31:20 32:21 35:10 40:8	160:3,18 161:1,11 162:5,8 163:23 164:1
58:1,3,22 59:6,15,16 98:15 99:4 101:1	12 41:17 48:1 57:5 58:14 59:10 90:20	165:16,24 166:11,24 167:14 169:19
180:11 181:4 188:1,11 189:25 200:5	193:10 104:1,14 113:22 114:2 119:15	170:12,15 171:4 181:20,25 182:1 186:24
201:1,5 206:5 209:5 213:10 221:11	136:12 148:7 151:8,19 169:11 176:1	187:2,22,23,25 190:20 191:18 193:6
terminating 80:13	191:22 194:22 198:16 203:3,7,25 216:21	194:4,11,24 196:20 198:3 201:9,25
termination 57:10,20 59:23 181:9,12	221:4,20 223:6,9 227:5,14 228:8,23,25	209:20 210:13,21 211:17 213:7 217:17,
190:20,24 191:18 194:15 201:8 213:18	235:15 241:8,16,18	23 221:8 223:8 227:18 229:6 233:7
215:14	third-party 111:1 144:1	236:5,6,11,14 238:15 241:11 242:21
terminations 24:4 215:13	Thomas 117:1,4	243:7 244:9
terminology 30:10 57:13	thoroughness 331:18	times 19:23 31:18,25 48:18 50:18 55:23
terms 14:9 16:7 30:25 36:13 37:1,12	thought 24:15 28:2 44:24 45:13 47:6,	56:18 72:14,21,24 73:2,17,18 76:12 85:2
41:17 49:5 52:16 55:25 56:19,21,23	69:9 93:24 110:17 118:13 119:13,24	88:25 95:19,23 97:5 130:14 142:5 143:1
72:15 76:2 92:25 105:15 111:9 115:1	121:11 130:12,14 135:10 143:24 222:24	145:14 151:5 159:22,24 160:2,5,8 169:1
123:25 129:13 142:18 143:16 154:12	threat 156:17	174:16 176:23 177:4,6,7 182:8,9,10
157:6 160:4,23 162:13,16 167:5,12	threaten 108:21	189:10 196:8,9 203:23 208:24 214:19
180:12 182:19 183:15 184:16,22 195:1	threatened 94:7 116:20 176:23 177:1,5	217:23 224:13,15 244:6
198:14 206:3 213:2 238:1 240:6,10 242:20	threatening 11:10 181:10,14	timestamp 27:4,15
Terrence 62:4	threats 194:20	Tiny 93:4
terroristic 194:20	three-hour-plus 57:17	tip 23:4 54:14 196:5
Terry 53:14 62:4,5,10 63:4 77:1 93:3	three-year 160:6	tissue 47:14
test 26:17,18,21	throwing 111:9	title 18:7 28:22 178:10
testified 72:3 107:2 124:17	ticket 44:21,24,25 45:1,3,14 46:24 47:2	toboggan 200:1
testifies 9:17		today 10:21 21:18,25 45:11 151:17

61:1,11,22 62:10,16,19 63:4 64:2,20,24 65:5 66:22 67:17,25 68:1,4 69:13 75:9 79:1 80:25 81:5,13 82:5,22,24 83:7,11,15 85:7,9 87:13 90:4,5 91:15,23 92:20 96:9 11,13,19 97:5 102:23 104:11,17 105:15 106:8 112:2,6,20 121:2,5,16,20,24 124:3 127:24 130:21,25 133:16 135:6 140:17 141:1,3,16 142:19,21 143:25 145:15 149:8,21,23 150:4,17 154:21 156:11 158:23 165:14,22,25 167:9,10 172:5,8 11,14,24 174:4 176:14,17 177:13,14,20 22,23 178:2 180:7,21 181:17,23 182:21 186:4 188:2,17 189:6,12,16,25 190:4,5 13,14 191:2 192:5,19 193:3 194:19 196:10 197:7,9,16 200:11,16,19,20,22 201:6 213:12 214:5,7 216:17 218:14 219:2 220:20,22,25 221:2 222:19 223:17 227:23 228:4 229:5,9,13,14 230:16 234:1,3,7,13,18 239:4	trainees 32:21 training 12:1,2,5,6,9 13:3,8,12,16 16:20,22 17:1,3,5,17 32:4,6 34:6 37:5,8 38:25 39:14 41:10,12,22 42:15 47:23 49:18,20 50:10 53:8 55:5 60:8 94:24,25 95:5 102:14,20,24 103:1 157:18,20 158:6,7,8,25 161:3,20 162:6,18,20 163:13 169:8 217:18 239:12 transcribed 45:4 transfer 59:24 60:3 61:3,14 63:10 64:1,7,22 65:7,18 66:4 68:12 71:5,11,23 72:5 75:3 77:18 175:25 198:12 240:22 transferred 1:11 23:1 59:25 60:6,16,24 63:16,18 64:17 68:5 72:10,11 74:18 75:4,10 77:11 107:9 217:12 240:4,20 transport 155:1 166:25 172:17 trash 45:17 treatment 231:24 trigger 81:24 132:4 triggered 198:17 trooper 78:6,8 117:1,2,4 troopers 116:6,23 Trooper's 34:18 trouble 43:22 truck 137:8 true 58:17 97:12 107:2,19 124:19 130:24 156:9 170:5,8 182:21 183:2 196:25 202:6 218:13 220:19,24 trumped 231:17 truth 9:16,17 60:19,22,23 131:19 243:10 truthful 44:1 truthfully 156:20 tuition 232:12,15 turn 87:14,25 89:11 104:3 117:15,21,22 118:19,21 121:8,13 125:6 128:10 129:6,11,18 130:2,17 135:13 223:24 225:8 turned 27:5 67:7 118:3,5,11,13,14 119:10,15 121:1,7 128:13 130:4,5,7,10,13,14,22,25 131:1 183:20 206:15 turning 104:19 118:1 121:12 135:15 twisted 109:18	two-and-a-half 2:15 50:7 239:12 two-year 29:8,11 232:23 type 13:3 31:9 80:15 87:3 128:21 132:3 173:16 198:9 typed 39:20 types 12:22 13:24 48:25 49:19 typo 105:7 <hr/> U <hr/> uh-huh 10:3 231:3 240:18 ultimate 14:10 ultimately 68:15 unable 16:8 21:22 30:22 31:5,22 51:10 52:19 53:25 69:12 167:5 232:25 unbecoming 15:18 uncertified 48:15 53:15,17,18 122:5 uncommon 18:9 128:22 153:24 uncooperative 45:8 152:10,22,23 undersigned 43:16 understand 9:9 71:11 137:23 219:23 understood 6:14 37:7 49:18 218:23 219:25 unemployment 9:20 39:19 40:17 41:4 58:14 133:4 222:8,17 unfortunate 51:3 183:14 unicorn 239:10 unit 183:5 university 11:10,13 12:13,14 17:25 19:9,17 27:3 unjustifiably 225:22 unlawfully 153:1 unnecessary 138:8 unpack 35:10 unprofessional 11:8 194:21 217:24 untruthful 40:15 205:7,9,14 upper 104:15 123:18 153:4 162:12 168:2 170:25 206:14 upset 44:5
--	---	--

utter 114:12	VII 178:11	139:18 140:1 141:8,10,15,17,20,21,22,23,24 142:2,4,19 143:9,14,15 144:16,18,22 149:9,22,23 155:25 184:1,2,3,19,25 185:25 214:1
uttered 174:2	violated 84:25 195:25	
	violating 88:13 98:17 206:6	
V	violation 49:11 52:19 80:1 81:18,21,22 95:2 96:3,23 102:17 105:9,14 137:12 157:19 177:18 185:19 205:17	Warren 50:4
vacancies 23:8	violations 48:25 49:3 82:10 90:12,24 100:18 132:23 133:20 134:4,8,10,11 185:11,15 220:7	Warrenton 16:8
Vance 8:7 15:21 16:15 17:6 19:20 22:19 24 27:13 29:12,16 30:8,15,17 31:19 32:10 33:10 34:15 35:17 36:15 37:15,17 38:15 39:11,12 41:3,17 49:16 50:17 54:24 57:16,21 98:15,19 100:12 102:25 105:11,16 116:5 117:3 131:9 153:22 201:11 202:5 203:20 204:3 207:12 210:20 211:10 212:21,23 213:11 214:25 215:14 216:6,13 224:24 227:3,9,13,25 228:11,12,15,17 229:17 230:1,18 231:9,10,13,24 235:15	virtually 236:20	wasn't 94:13 107:5 177:13
VCSO 221:11 233:10,17 235:6	visit 147:6,7,8 182:2,11	watch 62:20 96:19 220:25 221:1
vehicle 49:2 50:8 86:16 102:14 103:21 117:6 120:23 126:9 132:19 134:2,18 135:1,5 151:24,25 171:20	visited 72:23 146:18 147:2	Watkins 26:1 58:6,8,22,23 59:14 63:22,23 64:6 66:25 67:4,10,21 68:1,4 114:13 115:8 172:5,21,23 173:12,22,24 174:2,6 15,19,22 180:4 187:6,8,17 188:1,15,20,22 200:21 220:22,25
vehicles 106:2 121:17,21,24	visitor 112:7	waves 115:22 116:11
vengeance 239:17	volunteering 14:25	Wayne 32:18,23,25 33:2,6 34:6,25 35:7,24 36:2,3,19 37:6 53:8 54:13 61:3,12 62:9,23 64:18 65:25 66:2,3 67:1 70:6 72:12 74:7,16 101:13 103:4,14 104:8,17 202:10
venture 230:24	W	Wayne's 73:5
verbal 30:16 43:13 88:9 108:9 113:19 115:14,21 116:7,24 174:15	Waffle 93:3	website 22:21
verbally 8:15 14:5 31:2 88:8 153:13	wait 71:15 73:24 119:17,19 181:2 235:22	weeds 64:12 65:2
verbatim 104:2 135:24 165:9 167:5,7 169:13	waited 133:12	week 29:19 32:8,12 48:15 53:2,3 57:25 61:18 69:8
verification 22:14,15	waiting 48:6	weeks 32:15 50:7 60:10 68:2 94:24 99:3,16 171:3 239:13
verified 137:2	waive 8:19	Welborn 117:25 120:23 121:2 122:16,20 140:11,16,17 142:20,21 148:4,11 155:24 156:9,11 165:13,17,18 166:4,11 167:2 171:22 172:16 176:3,5 183:1,7 186:4 188:2,4 191:25 192:11 194:10,14 195:24 196:3,13,18,25 201:23 220:20
verify 43:20,23 44:3,6 136:19	Wake 233:21	Welborn's 68:6
Veronica 69:18 70:2 72:1	walk 38:23 79:24 84:17 108:16 199:13	welcomed 75:11
versa 240:23	walked 24:24 25:1 92:9,11 148:25 149:12 152:3 200:21	Welding 24:12 25:25
versus 8:7 20:1 65:25 110:11 145:22	Wallace 68:20 148:16 190:17 198:5 222:6 223:11	Weldon 57:23 68:20 148:16 180:1 188:19 190:4,16 198:4,20 200:21,22 201:6 222:6 223:11
vetted 211:7 212:2	wanted 33:8 44:8,16,17 46:13 47:7,15 21 51:22 58:9,25 59:5,7 75:14 110:8,9 119:16 121:12 150:1 177:12 189:9 197:8 200:15 201:4 208:18 213:10	we's'd 150:12 152:17
vice 240:23	wanting 59:2 62:8 103:12 217:24	we're 103:10 208:4
video 8:15 118:7 122:14 126:5,7,8,13,24 127:1,2,3,4 128:3,4,5,12,14,20,24 130:1,15,18 131:3,6 132:3 243:6,12	warning 43:19 84:3,6 100:4 123:15,1 197:22 238:5 242:1	whatnot 36:16 94:8 96:22 97:4 144:13 197:17
videos 118:9 126:11	warrant 44:7 46:21 133:24 141:7 143:11,21 144:4 145:21 150:11 151:8,12 153:15,18,23,25 154:2,3,6,8 156:7,8,12 181:19,23,24 182:6,13,22,23,25 183:6,8,10,12 186:14,16 237:1	what's 144:13 163:10
view 105:11,16 209:6	warrants 41:16 42:13 46:16 49:21 50:5 100:19 133:1,24 137:2,11 138:2,10	
viewing 126:24		

WHEREOF 43:21	66:11,23 72:13,19 75:21 76:5 80:10	
whichever 50:3 53:5,6 118:5 149:10	112:10 155:17 175:15 178:7 203:9	Y
white 8:6,7 9:4,5,12,15,20 10:6 20:1	204:10 218:15,16,17 241:11	
25:1,4,9 27:8,24 28:6 30:21,23,24 33:9,	workbook 203:9,18	yards 139:12
15,17,18 35:5 41:24 42:2 43:1,11,14	worked 18:1,14 19:3,8,19 32:24 61:23	year 11:10 207:9
44:19,24 45:9,10,11 51:19 57:24 61:4,6,	66:16 75:16,17 159:18 212:7 223:13	years 28:10 29:6,12,16 30:7,12,15,17
62:22 63:11,14 65:25 68:12 75:2 78:3	232:2 239:11 241:6	31:3 49:7 78:9,11 117:13
81:17 82:4 83:15,25 88:8,12,16 94:23	working 12:13 18:4,5 32:2 38:15 39:14	yelling 91:17,20 151:20 152:1
98:6 100:18 103:2 105:8,21,24 107:16,18	54:23 62:13 69:24 73:13,14 94:8 100:9,	yellow 85:2
109:15 110:13 112:17,23 114:14 118:18	12 113:23 160:12 188:15,16 202:5,21	young 25:2 44:18 111:23 118:3
120:25 121:16,18 122:9,19,23 125:6	204:6,15 227:3 240:11,20,21 241:13	you'd 237:19
126:19 127:3 129:25 137:8 145:3,9	workplace 91:3 193:5	you'll 134:16
148:13,15 155:24 156:4 172:24 174:1	worried 174:20	you're 15:4 86:25 145:13
175:7 176:23 177:5 178:18 180:10 182:5	worries 110:13 233:14	
187:3 189:24 191:24,25 192:6 195:2	worry 34:1 173:1,5 174:5,11 176:15	Z
204:22 206:8 217:25 218:23,25 219:15,	216:17	
16,20 220:6,11,12,13,14,17 221:4,11,14	would've 16:12 135:4,6 164:23 198:17	Zachary 106:24
23 223:2 224:15 229:9,14 241:24 244:3	202:2 240:19,20,22	zoom 22:14 108:1 120:19 224:4
White's 22:5,6 64:1 99:18 102:14 126:9	wouldn't 184:5 235:18	
178:19 218:10 220:16	wow 205:11	
whites 217:5	wrapping 216:24	
White's 28:18 218:23	wreck 43:10 120:2 121:9,14 125:11	
whomever 118:20 144:12 163:22	129:14 130:2,4,6	
222:15	write 40:7 133:16,18 172:6 202:20	
William 231:5	203:7,14,17	
win 179:15	write-up 82:12,13 91:1,2 113:6 124:1	
winter 200:2	175:21 182:4 185:13 197:19,20,23	
withdrawal 81:15	228:25 229:1	
witnessed 232:1 244:20	write-ups 66:13 198:18 229:2	
woman 88:12 111:23 147:9 164:17	writing 29:18 37:2 130:7 148:17 203:10	
219:20 220:6	239:9	
woman's 118:3	written 39:20 40:1,4,13 58:17 84:3,5	
Womble 9:22	89:12 100:4 110:8,9 123:15,17 196:4,8	
won 133:5 222:9	197:8,21 238:3,5 242:1,3	
word 16:7 26:6 40:19 58:21 95:8,9,11	wrong 44:14 62:5 66:20 69:13,18 88:5	
111:9 114:10 163:9 190:25 191:2,5,10	112:19 114:16 149:14 151:5 166:3,6,10	
15,22,23 192:5,20,21,23 193:1,3,13,25	169:18 205:9 212:15,25 213:2 219:21	
194:2,5 234:21	wrongfully 241:20	
worded 137:19	wrote 40:3,6 82:11,13 84:11 89:20 96:10	
words 88:25 91:11,21 103:24 104:2	104:14,25 110:10 216:20 221:5	
109:18 111:6 119:22 135:21 142:23		
167:5 219:11,17		
work 12:8 14:18 27:13 29:12 30:15,17,		
25 36:15 48:7,8 49:22 50:2 56:11 62:25		

W. Bullock Dep.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

vs.

(taken via Zoom)

**CERTIFIED
TRANSCRIPT**

VANCE COUNTY, NORTH CAROLINA;
VANCE COUNTY SHERIFF'S OFFICE;
PETER WHITE, in his official
and individual capacities;
LAWRENCE D. BULLOCK, in his
official and individual
capacities; and WELDON WALLACE
BULLOCK, in his official and
individual capacities,

Defendants.

Oral deposition of WELDON WALLACE BULLOCK,
located in Vance County, North Carolina, taken by
Plaintiff on Thursday, February 25, 2021, commencing
at 10:06 a.m., before Janet Cooper Haas, a Registered
Professional Reporter and Notary Public located in
Charlotte, Mecklenburg County, North Carolina.



(866) 715-7770
advancedONE.com

<div>Page 2</div> <div>1 APPEARANCES: 2 LAW OFFICES OF SHARIKA M. ROBINSON, PLLC 3 BY: SHARIKA M. ROBINSON, ESQUIRE 4 MICHAEL MCGURL, ESQUIRE 5 10230 Berkeley Place Drive 6 Suite 220 7 Charlotte, North Carolina 28262 8 704.561.6771 9 srobinson@sharikamrobinsonlaw.com 10 mmcgrl@sharikamrobinsonlaw.com 11 Counsel for Plaintiff (via Zoom) 12 13 WOMBLE BOND DICKINSON 14 BY: CHRISTOPHER J. GEIS, ESQUIRE 15 LOUISA C. CLARK, ESQUIRE 16 One West 4th Street 17 Winston-Salem, North Carolina 27101 18 336.721.3543 19 chris.geis@wbd-us.com 20 louis.c.clark@wbd-us.com 21 Counsel for Defendants (via Zoom) 22 23 ALSO PRESENT: 24 25 Peter White, Defendant</div>	<div>Page 4</div> <div>1 P R O C E E D I N G S 2 Pursuant to NCGS 10B-25, WELDON WALLACE BULLOCK 3 having been duly sworn remotely, was examined and 4 testified as follows: 5 6 EXAMINATION 7 BY MS. ROBINSON: 8 Q. Good morning, Mr. Bullock. I'm not going to 9 repeat what I just said. Okay? But I did want to 10 introduce myself as Sharika Robinson. I have my 11 colleague, Michael McGurl -- he's here also and will 12 be participating. 13 Have you ever been deposed before or a 14 witness? 15 A. Yes, ma'am. 16 Q. You have? Okay. So you know the drill 17 then. The reporter -- everybody asks that you answer 18 questions in "yes" or "no." And for purposes of 19 I will refer to Mr. White, the Plaintiff, as 20 "Mr. White" and Sheriff White, the sheriff, as 21 "Sheriff White" so there's no confusion. 22 Is there any way that you would like for me to 23 refer to you? 24 A. Mr. Bullock is fine. 25 Q. Mr. Bullock? So we don't confuse the two Bullocks. Okay.</div>
<div>Page 3</div> <div>1 EXAMINATION INDEX 2 WELDON WALLACE BULLOCK (via Zoom) 3 BY MS. ROBINSON 4 5 EXHIBIT INDEX 6 7 Exhibit 1 3-4-17 J. White VCSO application 8 Exhibit 2 J. White background check letters 9 Exhibit 3 Directive B.9, Use of Force 10 Exhibit 4 J. White use-of-force administrative 11 investigation 12 Exhibit 5 BLET subject control/arrest techniques 13 Exhibit 6 Directive F.13, Use of Canines 14 Exhibit 7 8-20-18 A. Hight employee counseling 15 record 16 Exhibit 8 9-6-18 W. Bullock firearms 17 qualification record instructions 18 Exhibit 9 9-6-18 use-of-deadly-force handout</div>	<div>Page 5</div> <div>1 So are you prepared to testify? Have you 2 you're free of medications, free of anything that 3 would impair your testimony today? 4 A. Yes. 5 Q. Okay. So will you state your name for the 6 record. 7 A. Weldon Bullock. 8 Q. And your birthdate? 9 A. March 28th, 1967. 10 Q. Okay. Can you tell me your address. 11 A. 1029 Wood Owl Way in Durham, North Carolina. 12 Q. Okay. Have you always resided in North 13 Carolina? 14 A. For a brief period of time, I wasn't. 15 in New Jersey. 16 Q. What about high school? Where did you 17 high school? 18 A. In North Carolina. 19 Q. Can you tell me the name of that. 20 A. Vance Senior High. 21 Q. Yes. And did you go to college? 22 A. I did. 23 Q. Where did you go to college? 24 A. North Carolina Central University. 25 Q. Okay. And what did you major in?</div>

Page 6	Page 8
<p>1 A. Criminal justice.</p> <p>2 Q. Did you seek any education after your</p> <p>3 bachelor's degree?</p> <p>4 A. I briefly started on my master's in</p> <p>5 education, but I didn't complete it.</p> <p>6 Q. Okay. And where was that at?</p> <p>7 A. At North Carolina Central University.</p> <p>8 Q. Okay. So can you tell me about your career</p> <p>9 as a police officer or as a sheriff's deputy or -- so</p> <p>10 after college, where did you work?</p> <p>11 A. I was recruited by the U.S. Drug Enforcement</p> <p>12 Administration out of Newark, New Jersey. I worked</p> <p>13 with them briefly as an intern. And then I came back</p> <p>14 to Vance County, and I worked for the Vance County</p> <p>15 school system probably less than three</p> <p>16 years. Then in 1992, I started working at the</p> <p>17 Sheriff's Office.</p> <p>18 Q. Okay. What was your position initially?</p> <p>19 A. Deputy sheriff.</p> <p>20 Q. How long were you a deputy sheriff?</p> <p>21 A. I think my first promotion was</p> <p>22 investigator, and that was in 1997. So</p> <p>23 worked the road as a deputy sheriff as a</p> <p>24 deputy. Then I was switched to the civil</p> <p>25 division. Then I was switched to the civil</p>	<p>1 work court. You would serve your warrants and see</p> <p>2 your criminal papers from some of the subpoenas.</p> <p>3 Sometimes there were papers.</p> <p>4 Q. Okay. And so we're at -- 1992 is when</p> <p>5 started at Vance County Sheriff's Office, and the</p> <p>6 were promoted in 1997 to patrol.</p> <p>7 And what happened next in your career?</p> <p>8 I was promoted in 1997 to investigation</p> <p>9 To investigations? Okay.</p> <p>10 And what type of investigations?</p> <p>11 I was promoted to criminal investigation</p> <p>12 I worked, you know, all types of criminal cases</p> <p>13 I came back. I specialized in child sex abuse.</p> <p>14 Q. Okay. And how long were you in that</p> <p>15 position?</p> <p>16 Vance County. I was an investigator -- I was an</p> <p>17 investigator until 2005. I had to serve some act</p> <p>18 supervisor roles in investigation, but I don't know</p> <p>19 when those dates were. But once I came out of</p> <p>20 investigations, I came out of investigations and</p> <p>21 to promoted to a lieutenant in administration, and t</p> <p>22 from was either 2004 or 2005. I'm not quite sure of t</p> <p>23 date. I mean, I'm not quite sure of the year.</p> <p>24 Q. All right. And as a lieutenant, what w</p> <p>25 your job duties?</p>
Page 7	Page 9
<p>1 then I was promoted to investigations.</p> <p>2 Q. Okay. So when you started as a deputy</p> <p>3 sheriff, were you trained at all?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. What type of training did you</p> <p>6 undergo?</p> <p>7 A. I went to the basic law enforcement school</p> <p>8 here in Vance County, and when I completed</p> <p>9 law enforcement school, I went through a</p> <p>10 phase for about -- I'm not sure of how</p> <p>11 had to ride with a sergeant for a while</p> <p>12 once I finished that training phase, then</p> <p>13 of on my own.</p> <p>14 Q. Okay. "For a while," would you say a week</p> <p>15 or two weeks or --</p> <p>16 A. No. It -- it was -- it was at least</p> <p>17 months, a minimum of two months. It might have been</p> <p>18 longer, and I don't know how long it was.</p> <p>19 Q. Okay. So you mentioned that you started</p> <p>20 at -- so you started as a deputy sheriff, and you did</p> <p>21 a little patrol.</p> <p>22 Can you explain what that entailed?</p> <p>23 A. You was assigned to a district</p> <p>24 would answer calls that were given to you.</p> <p>25 do things like transport mental patients</p>	<p>1 A. I was an administrative lieutenant. I</p> <p>2 records. I was -- I believe I was doing thi</p> <p>3 in evidence. I was over the civil division. I c</p> <p>4 administrative investigations. Well, I actually</p> <p>5 administrative investigations as early as -- in m</p> <p>6 since my criminal -- that's my investigative posi</p> <p>7 continued doing those type investigations.</p> <p>8 Right now, that's what's coming to mind</p> <p>9 training.</p> <p>10 Q. Okay. In terms of the obligations?</p> <p>11 A. Uh-huh.</p> <p>12 Q. So you said that you were over evidence</p> <p>13 What does that mean?</p> <p>14 A. When deputies or investigators, offices</p> <p>15 the sheriff's office collected evidence on the sc</p> <p>16 I was the person they turned it in to, and I was</p> <p>17 least one of the evidence room.</p> <p>18 Q. Okay. And how long were you in that</p> <p>19 position?</p> <p>20 I started as an investigator, and I don't</p> <p>21 know how long. And in some form or fashion, I w</p> <p>22 involved with it until I retired.</p> <p>23 Q. Okay. Did you ever go to court when yo</p> <p>24 were in that position?</p> <p>25 A. You would I did.</p> <p>Q. Is that where you were primarily depose</p>

Page 10	Page 12
<p>1 A. No. I've been deposed on -- when 2 "go to court," I went to court in criminal cases to 3 testify in criminal cases. 4 Q. Okay. 5 A. Things from homicide to break-ins, having the in-house application done. I would do 6 sex abuse cases. criminal background check, a pre-employment criminal 7 Q. Okay. So I'm going to come back to you background check, on the applicant, and then we would 8 saying that you were specifically over evidence. the applicant up for an interview. 9 When you were in that position, did you ever 10 misplace or lose evidence? The applicant would come in for an interview 11 A. No. I never misplace or lose evidence. I know, according to what the circumstances are 12 Q. Had evidence ever been misplaced of any kind, that was a three-person panel interview 13 Vance County? and then once that process is complete, then we would 14 A. Yes. make our recommendations to the sheriff and then 15 Q. In what situation? whether or not to hire or not to hire or our opinion 16 A. I can remember one time one of the drug Q. Who is "we"? Was there a specific panel 17 officers, what he -- what he noted on the sealed designated panel? 18 envelope as far as the money -- what he noted was an Yes. So, typically -- and I don't remember 19 amount that wasn't in the sealed envelope. When told over the years. But, typically, there would be 20 lawyer and I sat down and opened the sealed envelope, myself, and maybe a captain or another 21 it was, like, \$20 short. lieutenant. So I don't know who they were, you know 22 I remember an incident where a gun was taken a little time, but there's typically three people 23 from an investigative scene out in the public that -- Lieutenant Shearin was one of them that I 24 never -- it was never turned in to evidence. remember and Watkins. I don't know if he was a 25 received it into evidence. And even though a captain or lieutenant over time. He might have been</p>	<p>11 hiring process of a sheriff's deputy? 2 cases to We would have an in-house application to 3 someone may turn in, or sometimes they would go out 4 and turn in the F-3 form without going -- having 5 the in-house application done. I would do 6 criminal background check, a pre-employment criminal 7 background check, on the applicant, and then we would 8 the applicant up for an interview. 9 The applicant would come in for an interview 10 as little as one time, as many maybe as three times 11 I know, according to what the circumstances are 12 of any kind, that was a three-person panel interview 13 and then once that process is complete, then we would 14 make our recommendations to the sheriff and then 15 whether or not to hire or not to hire or our opinion 16 Q. Who is "we"? Was there a specific panel 17 designated panel? 18 Yes. So, typically -- and I don't remember 19 over the years. But, typically, there would be 20 myself, and maybe a captain or another 21 lieutenant. So I don't know who they were, you know 22 a little time, but there's typically three people 23 that -- Lieutenant Shearin was one of them that I 24 remember and Watkins. I don't know if he was a 25 a captain or lieutenant over time. He might have been</p>
Page 11	Page 13
<p>1 received it into evidence, it was still something that 2 the Vance County Sheriff's Office at some point had 3 control over, even though it never made it into the use 4 evidence room. 5 And then I remember an incident where 6 deputy took a gun off of somebody, and that never got 7 into evidence. It never made it into evidence. people that -- along with me who have performed that 8 Q. Why would items never make it into evidence? 9 A. I can't answer that. I can't answer who. Q. -- But it's been primarily lieutenants? 10 why somebody else did something, that they didn't turn. Primarily, the lieutenants or higher. 11 it in. I was the one responsible for it. I don't know. Q. Can you help me understand just the 12 into evidence. structure of the Vance County Sheriff's Office. 13 Q. Okay. But did situations like that ever not in law enforcement at all. Just pretend 14 happen before at Vance County -- in Vance County. Now nothing about law enforcement from a -- what 15 A. Yes, ma'am. are the particular roles? Lieutenant, deputy -- 16 Q. Okay. So let's change gears a little bit. Deputy, lieutenant, captain or -- 17 and discuss the current hiring process at the Vance So the -- starting from the lower level 18 County Sheriff's Office. going up through the ranks, you may have a person 19 A. I don't know anything about the current -- who's hired and not gone through BLET yet. 20 hiring process. I don't -- I'm retired. I don't know. I don't know. I don't know. I don't know. I don't know. 21 Q. Well, when you were there. I don't know. I don't know. I don't know. I don't know. I don't know. 22 I don't want you to speak for, you know, Sheriff Brame that's -- you know, the kind of termino 23 and what he does. for that is -- you know, that's, like, a candidate 24 A. Okay. a new hire or, you know, however you want to do it 25 Q. So when you were there, what was the typical</p>	<p>11 You know, at some point, he might have 12 lieutenant. Then he might have been a captain. 13 it into the use of names without the rank, Shearin has done 14 it, Watkins has done it, I believe Shelton has done 15 it, Stainback has done it. 16 that never got So over the years, there have been different 17 people that -- along with me who have performed that 18 Q. -- But it's been primarily lieutenants? 19 Primarily, the lieutenants or higher. 20 Q. Can you help me understand just the 21 structure of the Vance County Sheriff's Office. 22 that ever not in law enforcement at all. Just pretend 23 now nothing about law enforcement from a -- what 24 are the particular roles? Lieutenant, deputy -- 25 a little bit. Deputy, lieutenant, captain or -- So the -- starting from the lower level going up through the ranks, you may have a person who's hired and not gone through BLET yet. I don't know. I don't know. I don't know. I don't know. I don't know. I don't know. I don't know. I don't know. I don't know. I don't know. that's -- you know, the kind of termino for that is -- you know, that's, like, a candidate a new hire or, you know, however you want to do it that typical</p>

Page 14	Page 16
<p>1 but hadn't done the state basic law enforcement training. In terms of responsibility, that's probably the lowest level of responsibility. And then you'd team up to report to the chief deputy. The you're a deputy once you finish out that period. Chief Deputy was directly to the sheriff. the deputies are the ones that primarily take on the bulk of the calls and do the -- serving the stuff like that.</p> <p>2 Within that shift over time, is sergeant, then you may have what's -- what as a senior deputy. And that's a deputy experience than the BLET candidate, has long enough to kind of understand the of deputy, who may understand the roles supervisor but not -- has not been officially to sergeant, which is the next step up.</p> <p>3 The sergeant is the first-line that runs the shift, and within that shift, deputies in which is he supervises on the the same instance where -- on the patrol criminal investigations, there may be in an instance, would have been promoted a deputy and you went to -- as a detective consider that a promotion.</p> <p>4 Some may say that the -- transferring sergeant to a detective may be a lateral</p>	<p>1 times we did and did not have a chief deputy. That's one thing we had a chief deputy, and the two cap the lowest level of responsibility. And then you'd team up to report to the chief deputy. The you're a deputy once you finish out that period. Chief Deputy was directly to the sheriff. the deputies are the ones that primarily take on the bulk of the calls and do the -- serving the stuff like that.</p> <p>2 A. I was chief deputy.</p> <p>3 Chief deputy? And so as chief deputy, were over -- you were one of those people who would hire and make use-of-force decisions and things of that nature?</p> <p>4 Say that again.</p> <p>5 Q. You would hire, make hiring decisions and recommendations and use-of-force decisions?</p> <p>6 A. Well, that -- some of those recommendations I don't -- "decision" might not be the right word. But some of those recommendations, I side in. Q. As a captain?</p> <p>7 Yeah.</p> <p>8 If you were But you were definitely doing it as a captain, too, also, right, recommendations?</p> <p>9 A. Yes.</p> <p>10 Okay. So I would like to talk more about Mr. White specifically. Can you -- can you explain</p>
Page 15	Page 17
<p>1 of because the pay is almost the same whether it's a promotion or not, but you have nonsupervisory employees working. It's just deputies, but they're called investigators. Some of them. I don't know which one. He sat down within investigations, you have a supervisor, a sergeant, and then the panel interviewed him. I was a sergeant, a detective sergeant.</p> <p>2 On the same line, you may have a civil division. Within the civil division, you have deputies working, and then you may have a sergeant working within the civil division.</p> <p>3 Over time there have been detectives in the drug unit that may or may not have a sergeant supervising them. Sometimes it was a sergeant, sometimes they weren't. And then after the sergeant level, then you have the starting of the command level, then you have the starting of the command level of lieutenants.</p> <p>4 In the patrol division, typically lieutenants that would supervise two sergeants who supervised however number of deputies the shift. In investigation, there was a lieutenant who supervised the sergeant, who supervised investigators on the shift.</p> <p>5 Then you had a patrol commander, which was the position I served in for a while. And</p>	<p>1 the hiring process when it came to Mr. White.</p> <p>2 A. Just like before, he filled out an application, whether it was in-house or he had an application. I don't know which one. He sat down with a panel, and then the panel interviewed him. I was the one that did his criminal background check.</p> <p>3 And once we got all of that stuff together, the sheriff made the decision to hire him. Then once he got hired, he eventually went to the patrol division.</p> <p>4 Q. Did you review his application?</p> <p>5 A. Yeah. I would have been the one that reviewed his application, his -- well, yeah. I think I was the first officer to see his application. I don't know if the sheriff saw it before I did, but I had it extensively because I was the one that actually did the background check.</p> <p>6 Q. Okay. I'm going -- I'm going to pull up his application and make sure that this is what you looked at.</p> <p>7 Can you take a look at this document.</p> <p>8 A. It looks like what I remember to be his application. That's the form which we used.</p> <p>9 Q. Just review it for -- can you scroll -- can you need us -- can we continue to scroll?</p>



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

Page 18	Page 20
<p>1 A. Yeah.</p> <p>2 Q. Okay. Just let us know when to keep going.</p> <p>3 A. Keep going. Okay. Okay. You can go.</p> <p>4 Okay. You can go. Okay. You can go.</p> <p>5 go. Okay. You can go. You can go.</p> <p>6 Q. That's the last page, Mr. Bullock.</p> <p>7 A. Okay.</p> <p>8 Q. I want to ask you some questions about this</p> <p>9 document.</p> <p>10 A. Okay.</p> <p>11 Q. So you -- can you identify this document?</p> <p>12 A. It's the document that we used as an</p> <p>13 in-house form to gather information on potential</p> <p>14 applicants.</p> <p>15 Q. Okay. And this is Mr. White's application?</p> <p>16 A. I believe it to be.</p> <p>17 MS. ROBINSON: Okay. Michael,</p> <p>18 scroll. And stop right here.</p> <p>19 BY MS. ROBINSON:</p> <p>20 Q. Do you see where it says Shaw University?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And you see where it says "reason for</p> <p>23 leaving"? Can you read that to me.</p> <p>24 A. "Terminated."</p> <p>25 Q. And Louisburg College. Can you read the</p>	<p>1 A. I have to go through DCI and run his</p> <p>2 record, his driving record. I have to g</p> <p>3 request from the clerk of courts anyplace he's ei</p> <p>4 Okay. You can go to school or graduated from high sc</p> <p>5 and pull the criminal records from the clerk of</p> <p>6 courts.</p> <p>7 I think Mr. White had gotten some higher</p> <p>8 that might have been outside of North</p> <p>9 Carolina, and so I might have had to request for</p> <p>10 criminal histories in those places that he lived</p> <p>11 school outside of North Carolina.</p> <p>12 as an Q. So would you say --</p> <p>13 potential A. His driving record would have been also</p> <p>14 part of the criminal background check.</p> <p>15 application? Would you say it was a pretty extensive</p> <p>16 background check?</p> <p>17 can you A. I wouldn't say it was extensive.</p> <p>18 Q. You wouldn't say it was?</p> <p>19 A. No.</p> <p>20 University? Okay.</p> <p>21 MS. ROBINSON: Michael, can you pull up</p> <p>22 the -- so we're going to mark Exhibit Number</p> <p>23 So --</p> <p>24 MR. GEIS: I don't think we marked</p> <p>25 Exhibit Number 1.</p>
Page 19	Page 21
<p>1 reason for leaving.</p> <p>2 A. Yes. "Terminated."</p> <p>3 MS. ROBINSON: Let's go to the next. Let's</p> <p>4 go down a little bit more.</p> <p>5 BY MS. ROBINSON:</p> <p>6 Q. So is it fair to say that Mr. White</p> <p>7 disclosed that he had been terminated?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. And let's go down. I have another</p> <p>10 question I want to ask you about this document while</p> <p>11 we're up -- while we have it up.</p> <p>12 MS. ROBINSON: Keep going. Keep going.</p> <p>13 BY MS. ROBINSON:</p> <p>14 Q. Can you read the last sentence on this page.</p> <p>15 A. "Are you willing to sign a two-year contract</p> <p>16 for employment?"</p> <p>17 Q. And what was his response?</p> <p>18 A. Yes.</p> <p>19 Q. I think that's it for this document. (Bell</p> <p>20 get back to the contract.</p> <p>21 So after you -- after you reviewed</p> <p>22 Mr. White's application, you said you conducted</p> <p>23 criminal background check?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. What did that entail?</p>	<p>1 MS. ROBINSON: Well, let's mark</p> <p>2 Exhibit Number 1 as Mr. White's application</p> <p>3 next. Let's go to the next. Let's go to the next.</p> <p>4 (Exhibits 1 and 2 were marked for identification)</p> <p>5 MS. ROBINSON: And we sent you this via</p> <p>6 email, too, Mr. Geis.</p> <p>7 MR. GEIS: Well, I didn't get the email</p> <p>8 and I looked at my emails 30 minutes ago. Y</p> <p>9 perfectly willing -- or you're perfectly wit</p> <p>10 her rights to introduce these documents. I</p> <p>11 think you should mark them.</p> <p>12 MS. ROBINSON: All right. I want you -</p> <p>13 want you to have them. Okay? And you do ha</p> <p>14 So if you need to take a break and ch</p> <p>15 email, please let me know.</p> <p>16 MR. GEIS: We will take a break. We'll</p> <p>17 about a ten-minute break. Thank you.</p> <p>18 MS. ROBINSON: Thank you.</p> <p>19 (Bell in proceedings from 10:35 to 11:01 a.m.)</p> <p>20 BY MS. ROBINSON:</p> <p>21 Q. So, Mr. Bullock, I was asking you about</p> <p>22 Mr. White's background, and I asked whether or no</p> <p>23 was extensive or not. Thank you. And you said t</p> <p>24 it wasn't extensive.</p> <p>25 MS. ROBINSON: Michael, can you pull up</p>

Page 22	Page 24
<p>1 document that shows -- yes.</p> <p>2 BY MS. ROBINSON:</p> <p>3 Q. Can you see that document?</p> <p>4 MS. ROBINSON: Let's go to Page 1</p> <p>5 Chris can identify that.</p> <p>6 MR. GEIS: You need to read that.</p> <p>7 BY MS. ROBINSON:</p> <p>8 Q. And I'm going to give you a few</p> <p>9 23-page document, so I'm going to give you a few</p> <p>10 you know, as long as you like to look over it.</p> <p>11 A. Can I move towards the screen?</p> <p>12 Q. Yes, sir. And, Mr. Bullock, if you would</p> <p>13 just let him know when to scroll down in the same</p> <p>14 fashion.</p> <p>15 A. You can scroll down. Okay.</p> <p>16 Okay. Okay. Okay. Okay. Okay. Okay.</p> <p>17 Put it so I can see the top of it. Okay.</p> <p>18 Okay. Okay. Okay. Okay. Okay. Okay.</p> <p>19 Okay. Okay.</p> <p>20 Q. And do you recognize this document</p> <p>21 documents?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. And is that your signature on these</p> <p>24 documents?</p> <p>25 A. Yes, ma'am.</p>	<p>1 documents, this exhibit.</p> <p>2 And so after reaching out to all those</p> <p>3 counties, obtaining Mr. White's criminal record,</p> <p>4 driving record, and other -- and reviewing his</p> <p>5 application, what questions did you have about his</p> <p>6 employment?</p> <p>7 A. About his what?</p> <p>8 Q. About his prospects for employment.</p> <p>9 A. I don't remember specific questions that</p> <p>10 had. We, in general, go over people's work histo</p> <p>11 where he went to school, where he lived, any crim</p> <p>12 you may have. We might talk about his</p> <p>13 same's history. We would talk about his employ</p> <p>14 history. We might -- some people we give, like,</p> <p>15 Okay. Okay. scenarios on how you will respond to a</p> <p>16 particular scenario.</p> <p>17 Okay. That's what's coming to mind right now.</p> <p>18 Okay. There may be others.</p> <p>19 Q. Well, I want you to, if you can recall,</p> <p>20 be these specific now about Mr. White.</p> <p>21 After you performed this background che</p> <p>22 him, what was his next step in the employment pro</p> <p>23 A. He would have been sworn in. And at sc</p> <p>24 point, he'll go to a shift. You know, he might n</p> <p>25 have immediately gone to a shift because we're a</p>
Page 23	Page 25
<p>1 Q. And can you identify these documents</p> <p>2 A. Those forms -- those AOC forms</p> <p>3 which I used to reach out to our clerks of courts</p> <p>4 requests for criminal background information.</p> <p>5 Q. And for purposes of the record, I would just</p> <p>6 like for you to -- we're going to start from the top</p> <p>7 and go to -- and then each county that you reached out</p> <p>8 to.</p> <p>9 Can you read that county. Just read the</p> <p>10 county.</p> <p>11 A. Martin County, North Carolina; Mer</p> <p>12 County, New Hampshire; Hillsborough County, New</p> <p>13 Hampshire; Hillsborough County, New Hampshire</p> <p>14 Is that the same document?</p> <p>15 Q. That's the same document.</p> <p>16 A. Okay. Wayne County, North Carolina;</p> <p>17 Franklin County, North Carolina; Wake County, North</p> <p>18 Carolina; Bertie County, North Carolina; Chowan</p> <p>19 County, North Carolina; Pasquotank County, North</p> <p>20 Carolina; Perquimans County, North Carolina; Pitt</p> <p>21 County, North Carolina; Union County, North Carolina</p> <p>22 Q. I think that was the last county, correct?</p> <p>23 A. (The witness nodded.)</p> <p>24 Q. And I'm going to ask you some more</p> <p>25 questions, but I think we're done with these</p>	<p>all, poor county. We might not have uniforms t</p> <p>2 are at this point. Sometimes cars aren't available a</p> <p>3 of courts point.</p> <p>4 Typically, what happens is there may be</p> <p>5 period, depending on when that applicant</p> <p>6 of uniforms and whatever, other</p> <p>7 conditions he might have. Like, he would hav</p> <p>8 go qualify for his service work, so that had to t</p> <p>9 And so typically what we do when we have p</p> <p>10 who are kind of caught in that phase, we have --</p> <p>11 Merit -- the sheriff's office is responsible for</p> <p>12 Newhouse security, and so sometimes we'll send</p> <p>13 people up to the X-ray for an undetermined amount</p> <p>14 time until all these things come, and then we can</p> <p>15 him ready to go to a shift.</p> <p>16 Then once he goes -- if he's -- in his</p> <p>17 particular case, he was hired to be a deputy. So</p> <p>18 know, he would be waiting for a shift assignment</p> <p>19 a shift. Some people we hire, and we have a -</p> <p>20 an investigator's opening, and we hire an</p> <p>21 investigator. Then an investigator would go stra</p> <p>22 investigation. But, again, everybody has to w</p> <p>23 to get qualified because of what happens at that</p> <p>24 point.</p> <p>25 After he's sworn in, he's -- you know,</p>

<p style="text-align: right;">Page 26</p> <p>1 a sworn deputy sheriff at that point.</p> <p>2 Q. Okay. Well, let's rewind. Let's rewind.</p> <p>3 He would have had his panel interview before why would you ever perform three panel</p> <p>4 you ran his background, or would that panel interviews?</p> <p>5 have come afterwards?</p> <p>6 A. No. I would have ran his background ahead of time sometimes. Sometimes the appli</p> <p>7 the panel review.</p> <p>8 Q. Okay. So after you ran his background, then there's just various reasons why we do i</p> <p>9 explain what happened next in Mr. White's case, if you And, again, a minimum of one that's bee</p> <p>10 can recall.</p> <p>11 A. I can't recall specifically. I can't recall specifically where before and he went and, say, worked a</p> <p>12 what I generally do. I can't recall specifically where before and he went and, say, worked a</p> <p>13 Mr. White. But you know, I -- the background is done in one place and then came back shortly after.</p> <p>14 different forms. They come in what you see here, they might have a one panel interview because we</p> <p>15 Administrative Office of Courts request they come familiar with that particular officer.</p> <p>16 through DCI, they come through NCIC, and they come Sometimes we have people who we've been</p> <p>17 through DMV.</p> <p>18 working with for years, like, at the police</p> <p>19 So I would have done all those things, and department. This is a small town, who we all --</p> <p>20 this stuff I may have gotten back or may not know we know. They might have an interview -- a</p> <p>21 gotten back. I'm caught at the mercy of the minimum of one. And some people, for whatever</p> <p>22 terms of getting back whatever informati on I need to, background, where they live, trying to g</p> <p>23 get back. And what -- but all this stuff is information in, you know, it's just -- it's no --</p> <p>24 and it's always compiling.</p> <p>25 Mr. White would have had to provide a particular way.</p> <p>26 copy of his Okay. So moving on. So Mr. White was</p>	<p style="text-align: right;">Page 28</p> <p>1 Mr. White specifically, I do not recall how many.</p> <p>2 of one, though.</p> <p>3</p> <p>4</p> <p>5 A. Sometimes we get information that we do</p> <p>6 have ahead of time sometimes. Sometimes the appli</p> <p>7 might not have information that we need when we a</p> <p>8 There's just various reasons why we do i</p> <p>9 And, again, a minimum of one that's bee</p> <p>10 done. For an example, what will be an example of</p> <p>11 a minimum of one, let's say there was an officer wh</p> <p>12 came in here before and he went and, say, worked a</p> <p>13 in another place and then came back shortly after.</p> <p>14 see here, they might have a one panel interview because we</p> <p>15 they come familiar with that particular officer.</p> <p>16 they come Sometimes we have people who we've been</p> <p>17 working with for years, like, at the police</p> <p>18 department. This is a small town, who we all --</p> <p>19 not know we know. They might have an interview -- a</p> <p>20 the minimum of one. And some people, for whatever</p> <p>21 on I need to, background, where they live, trying to g</p> <p>22 is information in, you know, it's just -- it's no --</p> <p>23 no concrete reason every single time it was done</p> <p>24 provide a particular way.</p> <p>25 copy of his Okay. So moving on. So Mr. White was</p>
<p style="text-align: right;">Page 27</p> <p>1 driver's license, social security card.</p> <p>2 was a previously sworn law enforcement officer, I</p> <p>3 would have had to have gotten his basic Law</p> <p>4 enforcement certificate.</p> <p>5 A. The recommendation to hire -- when you</p> <p>6 So at some point in time, all that stuff training standards. To training standards,</p> <p>7 being gathered and compiled as we're going through the recommendation. It should be on a form</p> <p>8 process of trying to get him hired.</p> <p>9 that I sent to training standards saying I recomm</p> <p>10 Q. Okay. But is it safe to say that the panel,</p> <p>11 the three panel, would have convened after you Q. Okay. So can you tell me, how does tha</p> <p>12 received all of the necessary documents? process work? Would you recommend him for hire t</p> <p>13 A. No, no. Not necessarily. It would be sheriff first and then to training standards or -</p> <p>14 safe to say that, because, again, some of this stuff Yeah. After we finish the last panel</p> <p>15 you get back ahead of time; some of the stuff in the interview, then a recommendation would be made to</p> <p>16 don't get back ahead of time. It just depends on whether to hire or not to hire.</p> <p>17 I had time to put it out, when I sat down at the Q. Okay. And so the recommendation ultima</p> <p>18 computer and ran the information and then was recommended to hire Mr. White?</p> <p>19 panel interview was.</p> <p>20 A. Not to the sheriff.</p> <p>21 Specifically to Mr. White, I can't tell you Not to the sheriff?</p> <p>22 how that fell in line.</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. Do you recall Mr. White's panel Q. So who recommended Mr. White for hire?</p> <p>25 interview and how many of those interviews he had? Once the panel -- our recommendations i</p> <p>26 A. I do not. He had a minimum of one, just a recommendation. Ultimately, the sheriff h</p> <p>27 like anybody else, they could do one or two. The last say on whether or not we're going to swe</p> <p>28 really depends. And maybe sometimes even three. You and I get all the information to training</p> <p>29 know, it depends on certain circumstances. Standards. He has that final say; the panel does</p>	<p style="text-align: right;">Page 29</p> <p>1 ultimately recommended for hire.</p> <p>2 Because Who made that recommendation?</p> <p>3 Law A. The recommendation to hire -- when you</p> <p>4 first recommended to hire, we send it to the sher</p> <p>5 that stuff training standards. To training standards,</p> <p>6 being gathered and compiled as we're going through the recommendation. It should be on a form</p> <p>7 that I sent to training standards saying I recomm</p> <p>8 Q. Okay. But is it safe to say that the panel,</p> <p>9 the three panel, would have convened after you Q. Okay. So can you tell me, how does tha</p> <p>10 received all of the necessary documents? process work? Would you recommend him for hire t</p> <p>11 A. No, no. Not necessarily. It would be sheriff first and then to training standards or -</p> <p>12 safe to say that, because, again, some of this stuff Yeah. After we finish the last panel</p> <p>13 you get back ahead of time; some of the stuff in the interview, then a recommendation would be made to</p> <p>14 don't get back ahead of time. It just depends on whether to hire or not to hire.</p> <p>15 I had time to put it out, when I sat down at the Q. Okay. And so the recommendation ultima</p> <p>16 computer and ran the information and then was recommended to hire Mr. White?</p> <p>17 panel interview was.</p> <p>18 A. Not to the sheriff.</p> <p>19 Specifically to Mr. White, I can't tell you Not to the sheriff?</p> <p>20 how that fell in line.</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Do you recall Mr. White's panel Q. So who recommended Mr. White for hire?</p> <p>23 interview and how many of those interviews he had? Once the panel -- our recommendations i</p> <p>24 A. I do not. He had a minimum of one, just a recommendation. Ultimately, the sheriff h</p> <p>25 like anybody else, they could do one or two. The last say on whether or not we're going to swe</p> <p>26 really depends. And maybe sometimes even three. You and I get all the information to training</p> <p>27 know, it depends on certain circumstances. Standards. He has that final say; the panel does</p>

Page 30	Page 32
<p>1 have that final say.</p> <p>2 Q. Okay. I understand. I'm just</p> <p>3 a timeline together.</p> <p>4 A. I don't know the timeline. I</p> <p>5 Q. So -- but he was ultimately --</p> <p>6 was hired.</p> <p>7 So the panel recommended him to</p> <p>8 A. No, the panel did not recommend</p> <p>9 hired.</p> <p>10 Q. The panel didn't recommend Mr.</p> <p>11 hired by the sheriff?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. So what did the panel</p> <p>14 didn't recommend him to be hired?</p> <p>15 A. I don't -- maybe I don't understand</p> <p>16 question.</p> <p>17 Q. Yeah. If the panel convened and</p> <p>18 Mr. White to determine if he was to be</p> <p>19 the sheriff to be hired, right, that was</p> <p>20 purpose of convening the panel, correct?</p> <p>21 A. The whole purpose of the panel</p> <p>22 information about the applicant so that</p> <p>23 determine whether or not we recommend</p> <p>24 or not.</p> <p>25 Q. Right. And that's what I'm saying</p>	<p>1 Q. And who was "we"? Who is "we"?</p> <p>2 trying to get I'm -- you know, typically we go back to</p> <p>3 whoever was with me during the time that we</p> <p>4 interviewed Mr. White, who -- the gentlemen -- the</p> <p>5 we know he of us would go back in -- or two of us, how</p> <p>6 many it was, would go back in and talk to the sheriff</p> <p>7 Q. But you don't remember who "we" was?</p> <p>8 A. No. I don't remember.</p> <p>9 Q. In this particular one, how many -- how</p> <p>10 White office has have you recommended in -- or deputies have</p> <p>11 you recommended not to be hired?</p> <p>12 A. I don't have a number. I've been doing</p> <p>13 then, if 1997. I couldn't -- there's no -- I have no</p> <p>14 of knowing. There have been a lot we recommended</p> <p>15 hire. There have been a lot we've recommended</p> <p>16 hire.</p> <p>17 Q. Give me just a roundabout number as in</p> <p>18 recommended five?</p> <p>19 A. It's -- if you could somehow tally up the</p> <p>20 amount of applications we've had since 1997 until</p> <p>21 this day in office, I mean, I cannot put a number on it</p> <p>22 because I have no way of formulating how many. I</p> <p>23 to justify making up something.</p> <p>24 Q. So in 1997, you were in investigation?</p> <p>25 A. I sat on panels in 1997 also?</p>
Page 31	Page 33
<p>1 Did this panel recommend Mr. White for</p> <p>2 hiring?</p> <p>3 A. No. Not to the sheriff.</p> <p>4 Q. Okay. So what did the panel do, then?</p> <p>5 A. We recommended not to hire him.</p> <p>6 Q. You recommended the sheriff not to hire</p> <p>7 Mr. White?</p> <p>8 A. That's correct.</p> <p>9 Q. And the sheriff went ahead and hired him,</p> <p>10 anyhow?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Okay. Can you tell me about that</p> <p>13 recommendation.</p> <p>14 A. I think vaguely we discussed that he had</p> <p>15 been fired for so many -- from previous positions that</p> <p>16 he had, and I think that was the reason why we</p> <p>17 recommended not to hire him.</p> <p>18 Q. Did you--all put that recommendation</p> <p>19 writing?</p> <p>20 A. I think we walked down to the sheriff and</p> <p>21 talked to him.</p> <p>22 Q. And what did the sheriff say when you said</p> <p>23 it?</p> <p>24 A. He said, "Unless he's killed the president,</p> <p>25 I'm going to hire him."</p>	<p>1 A. I did. I did. As a matter of fact, the</p> <p>2 forms you see, because it was so -- done so</p> <p>3 haphazardly before, I created these forms. I'm talking</p> <p>4 that started the process of coming in and going</p> <p>5 through -- sitting down and going through a process</p> <p>6 when I got hired and back under -- not Sheriff</p> <p>7 White but the other sheriff. You would walk in,</p> <p>8 he would shake your hand when you were hired.</p> <p>9 I was hired that way. I was hired with</p> <p>10 even putting an application in. He said, "You're</p> <p>11 hired." I came back to get an application after</p> <p>12 that process, and I thought that wasn't how the process</p> <p>13 to be. So this particular format you see here is</p> <p>14 that he had I came up with that.</p> <p>15 positions that So I've been doing that type work since</p> <p>16 1997.</p> <p>17 Q. Okay. Okay. So when you say -- you're</p> <p>18 talking about the letter on the sheriff's letterhead</p> <p>19 A. Yes.</p> <p>20 Q. Not the court form?</p> <p>21 A. No, not the court form.</p> <p>22 Q. Okay. But the court form requesting the</p> <p>23 background would have been part of the hiring process</p> <p>24 the president, Like, if you're referring to the AOC 31</p> <p>25 form --</p>

Page 34	Page 36
<p>1 Q. Yes.</p> <p>2 A. Right. This is something that</p> <p>3 I have been at the sheriff's office's where there</p> <p>4 wasn't even done.</p> <p>5 Q. Okay.</p> <p>6 A. That's why I -- the process had</p> <p>7 Q. Okay. Can -- when did that process -- when</p> <p>8 did the process of seeking a criminal background check</p> <p>9 start? Do you recall that?</p> <p>10 A. Well, you have to -- you have</p> <p>11 somebody's criminal background check.</p> <p>12 standards won't allow you to submit an applicant</p> <p>13 without a background check being done.</p> <p>14 background had to be done in some form</p> <p>15 The way in which it was done,</p> <p>16 early on, even -- even through me, you</p> <p>17 clerk up and say, "This is me. Send me</p> <p>18 you've got on this person right here," and</p> <p>19 do it. But then over time, that didn't</p> <p>20 didn't wash. So over time, we had to</p> <p>21 it in writing and sign it as the request</p> <p>22 they would send us the information.</p> <p>23 Q. Was that a --</p> <p>24 A. The way that started, I don't</p> <p>25 know in the beginning, it wasn't that way.</p>	<p>1 A. I'm sorry?</p> <p>2 we done, but</p> <p>3 point?</p> <p>4 A. He became sheriff in '06, I think. Hol</p> <p>5 '06. And he stopped being sheriff in 2018.</p> <p>6 Q. Okay. So you said it wasn't the first</p> <p>7 Can you name an instance in which he di</p> <p>8 recommendation?</p> <p>9 A. He didn't take my recommendation for</p> <p>10 Mr. White.</p> <p>11 Q. Aside from Mr. White.</p> <p>12 A. Oh, yes. There was a young lady named</p> <p>13 Kimberly Gregory from Durham.</p> <p>14 MR. GEIS: You can't talk about any</p> <p>15 you know, particular person.</p> <p>16 THE WITNESS: Oh, okay. All right.</p> <p>17 Well, there was a young lady who was fr</p> <p>18 Durham Police Department that I recommended</p> <p>19 the panel recommended to hire, and he didn't</p> <p>20 formally request, which stood out. The reason why that</p> <p>21 stands out in my mind is because her training</p> <p>22 portfolio was really, really thick. It was</p> <p>23 thick as this right here, and I thought she</p> <p>24 know, but have been a good hire.</p> <p>25 BY MS. ROBINSON:</p>
Page 35	Page 37
<p>1 Q. Was that due to a change in policy of</p> <p>2 training standards or policy of Vance County?</p> <p>3 A. No. That was just my own personal</p> <p>4 the bull by the horns and doing it because</p> <p>5 like the way it was done.</p> <p>6 Q. Okay. Okay. So Mr. White was</p> <p>7 recommended but was hired.</p> <p>8 Do you recall Mr. White when he started at</p> <p>9 the sheriff's department? Do you recall any -- any</p> <p>10 specifics about his employment?</p> <p>11 A. No. Once I -- because he's not</p> <p>12 division, I don't -- I wouldn't see him</p> <p>13 day-to-day basis, or I wouldn't interact</p> <p>14 day-to-day basis. You know, I -- once</p> <p>15 paperwork is gone, I don't -- you know,</p> <p>16 anything more in terms of directly interacting</p> <p>17 him on a day-to-day basis. I don't have</p> <p>18 I recall that I could add.</p> <p>19 Q. Okay. How did that make you feel</p> <p>20 sheriff did not take your recommendation?</p> <p>21 A. It didn't make me feel any kind</p> <p>22 That -- it wouldn't be the first time he</p> <p>23 my recommendation.</p> <p>24 Q. Okay. How long had he been the sheriff at</p> <p>25 that point?</p>	<p>1 Q. Okay. So I want to -- I want to unders</p> <p>2 your role a little more. I know you sat on these</p> <p>3 hiring panels, and that was probably one aspect o</p> <p>4 your role at the time of Mr. White's employment,</p> <p>5 particular. And I've asked you some about it, bu</p> <p>6 not would -- you said that you were in a different</p> <p>7 division.</p> <p>8 What division were you in?</p> <p>9 I was in charge of the administration</p> <p>10 division and the divisions that are under me.</p> <p>11 Q. So what does "administrative" mean,</p> <p>12 a "administrative division"?</p> <p>13 An I'm responsible for records, like for t</p> <p>14 all the records, gun permits, concealed handgun permi</p> <p>15 don't have papers, criminal investigations, evidence,</p> <p>16 facting kind background information, fingerprints. I was in c</p> <p>17 anything out of that division.</p> <p>18 Q. So, Mr. Bullock, walk me through, like,</p> <p>19 typical day in your life when -- at the time of</p> <p>20 Mr. White's employment.</p> <p>21 of way. A. I don't know. I don't know if I can sa</p> <p>22 didn't take day. I don't know if --</p> <p>23 MR. GEIS: Objection. Relevance.</p> <p>24 BY MS. ROBINSON:</p> <p>25 Q. You can answer the question. Please an</p>

Page 38	Page 40
<p>1 the question.</p> <p>2 A. I would come to work, and I would do my</p> <p>3 duties as -- you know, I would go over the reports. That's not part of your job. You know, when is t</p> <p>4 would look at them. It was there -- there were times If debris was in the road big enough to</p> <p>5 that I might not come to work because I was that would impede traffic, then, yeah, you would</p> <p>6 homicide the night before.</p> <p>7 Q. What type of reports would you go over?</p> <p>8 A. I would go over the incident reports. Q. Okay.</p> <p>9 Q. Okay. And what is an incident report? A. You wouldn't write a report for that.</p> <p>10 A. It's reports generated by officers when Q. Okay. So you mentioned incident report</p> <p>11 they're assigned a department number to 11 part of your mentioned use of force.</p> <p>12 incident, a particular record. 12 Tell me about your involvement in</p> <p>13 Q. By "incident" and "record," what does that mean? 13 Tell me about your involvement in</p> <p>14 -- does it mean something went wrong? Does it mean 14 Tell me about your involvement in</p> <p>15 something went right? What does that mean, an 15 Tell me about your involvement in</p> <p>16 "incident report"? 16 Tell me about your involvement in</p> <p>17 A. It means that the sheriff's department supervisor and sort of engage what was going on w</p> <p>18 involved in something that required a report that the And then if I felt that it was necessary f</p> <p>19 written. The reports could be on forms that's called an administration investigation, I wo</p> <p>20 investigation incident reports. The reports start an administrative investigation.</p> <p>21 something on a form called operation reports. It's Q. So would all use-of-force reports go th</p> <p>22 just -- they have numbers that you can track you? 22 track you?</p> <p>23 see, you know, who was assigned to it. 23 If the A. No. Not necessarily. They would --</p> <p>24 information was generated through 911, 24 depending on who -- you know, how extensive they</p> <p>25 that could be trackable and kind of figure out 25 something in which someone was hurt, that would c</p>	<p>1 incident report for that. I don't know.</p> <p>2 I'd do my Q. You wouldn't have to do that at all, ri</p> <p>3 That's not part of your job. You know, when is t</p> <p>4 If debris was in the road big enough to</p> <p>5 that would impede traffic, then, yeah, you would</p> <p>6 been expected to stop and get that stuff out of t</p> <p>7 go over? and move it over to the side.</p> <p>8 Q. Okay.</p> <p>9 A. You wouldn't write a report for that.</p> <p>10 Q. Okay. So you mentioned incident report</p> <p>11 part of your mentioned use of force.</p> <p>12 Tell me about your involvement in</p> <p>13 Tell me about your involvement in</p> <p>14 Tell me about your involvement in</p> <p>15 Tell me about your involvement in</p> <p>16 Tell me about your involvement in</p> <p>17 So would all use-of-force reports go th</p> <p>18 track you?</p> <p>19 If the A. No. Not necessarily. They would --</p> <p>20 depending on who -- you know, how extensive they</p> <p>21 something in which someone was hurt, that would c</p>
Page 39	Page 41
<p>1 happened, what went on. And the deputies would write something that you drew your gun and you</p> <p>2 those reports. And in the mornings, I would come in and do nothing else but drew your gun, that</p> <p>3 and I would look at those. 3 wouldn't come to me.</p> <p>4 Q. Are there any instances in which an incident report is required to be written? 4 Okay. So officers are required to repo</p> <p>5 report is required to be written? 5 when they draw their gun?</p> <p>6 A. Yes. 6 A. Yes.</p> <p>7 Q. What are those instances? 7 Q. And what would that -- that would be a</p> <p>8 A. A murder, you have to write an incident report. 8 use-of-force report?</p> <p>9 report. A break-in, you got to write an incident report. A. Use-of-force report and an investigation</p> <p>10 report. A rape, you got to write an incident report. 10 incident report.</p> <p>11 A chase, you got to write an incident report. 11 Use of Okay. And so you said the typical proc</p> <p>12 force, you got to write an incident report. 12 would be for you to contact the person's supervis</p> <p>13 got bit by a dog, you got to write an incident report. Yeah. I would have a conversation about</p> <p>14 There's a lot more than I could probably the officer writes, and I want to kind of ge</p> <p>15 name. 15 feel and let the supervisor know what was going o</p> <p>16 Q. Okay. 16 want to make sure the supervisor knew, and it may</p> <p>17 A. Those are just examples. 17 something as simple as a telephone call. And</p> <p>18 Q. Okay. And what are examples of when you 18 depending on when you were working, I just may ha</p> <p>19 don't have to write an incident report? 19 them come to my office. I may walk up to where t</p> <p>20 A. I don't know how to answer that question and just say, "Hey, do you know about this?"</p> <p>21 What are examples of when you don't? I don't know what happened?"</p> <p>22 that I can answer that question. It's 22 -- like Q. Okay. And what would you do next typic</p> <p>23 you're driving down the road and you see some trash in If it rose to the level of an administr</p> <p>24 the road and you get out of your car and you investigate, I would start an administrative</p> <p>25 trash out of the road, you wouldn't have to write an investigation.</p>	<p>1 would write something that you drew your gun and you</p> <p>2 would come in and do nothing else but drew your gun, that</p> <p>3 wouldn't come to me.</p> <p>4 Okay. So officers are required to repo</p> <p>5 when they draw their gun?</p> <p>6 A. Yes.</p> <p>7 Q. And what would that -- that would be a</p> <p>8 use-of-force report?</p> <p>9 A. Use-of-force report and an investigation</p> <p>10 incident report.</p> <p>11 Use of Okay. And so you said the typical proc</p> <p>12 would be for you to contact the person's supervis</p> <p>13 Yeah. I would have a conversation about</p> <p>14 the officer writes, and I want to kind of ge</p> <p>15 feel and let the supervisor know what was going o</p> <p>16 want to make sure the supervisor knew, and it may</p> <p>17 something as simple as a telephone call. And</p> <p>18 depending on when you were working, I just may ha</p> <p>19 them come to my office. I may walk up to where t</p> <p>20 question and just say, "Hey, do you know about this?"</p> <p>21 -- like Q. Okay. And what would you do next typic</p> <p>22 If it rose to the level of an administr</p> <p>23 investigate, I would start an administrative</p> <p>24 to write an investigation.</p>



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

Page 42	Page 44	Page 44
<p>1 Q. And that would consist of what 2 what an administrative investigation is. 3 A. I would gather information concerning the 4 particular incident, whether it be witness statements 5 or -- it may be having another officer go out and talk 6 to a person while I do something else. 7 will come down to talk to the officer that was the 8 subject of that particular use of force. 9 Q. And, typically, how long does those 10 investigations take to be resolved? 11 A. There's no typical. It depends on the 12 circumstances. 13 Q. Okay. 14 A. So I can't tell you what -- how long 15 typically they last, and I don't have a working frame 16 of, you know, how long these things take. 17 have that committed to any type of memory. 18 Q. On average? 19 A. You know, we've had officers to do 20 people, so that takes a little bit longer 21 officers to do something a lot less than 22 and they will be a little shorter, but 23 working memory of how long they take. 24 Things can be delayed by getting 25 information, and things can be delayed</p>	<p>1 Explain And the recommendation would be to -- w 2 this is? 3 It could be to exonerate. It could be 4 statements with pay. It could be to demote. It cou 5 go out and talk to them their services are no longer needed. 6 Eventually, it was there a particular continuum? So, 7 as the like, a -- if -- say an officer had -- Offic 8 had been involved in an incident report before, a 9 use-of-force report before, was there any type of 10 escalation, any type of process? 11 A. I don't know that I understand. 12 Q. Were there -- were there steps to the 13 consequences or -- to your recommendation? Did t 14 progressively get worse? 15 Oh, did the recommendation steps get wo 16 I based on what they did before? 17 Q. Yes. 18 A. No. I just -- my recommendation is bas 19 the incident I had before me. 20 We had. Q. Okay. So it could be a first-time inci 21 that if you felt like it was egregious enough, th 22 don't have a That's correct. 23 Q. So I want to -- are you familiar with t 24 you're familiar with the use-of-force policy, cor 25 somebody. A. not I don't have it to memory now because I</p>	
Page 43	Page 45	Page 45
<p>1 working or somebody in place. I don't 2 don't have a working memory of what -- how long 3 something like that would take. 4 Q. Can you tell me about the steps? Was there 5 any set number of steps that you would take from 6 report to completion? 7 A. I don't know that I understand 8 mean by "steps"? 9 Q. Any way in which you would operate to 10 investigate a case? Would you convene a panel? 11 you -- you know, you talked about meeting with 12 supervisor. 13 A. So, no, I wouldn't convene a panel. I 14 would, again, interview any witnesses, interview this 15 victims. I would gather data from 911. 16 gather data from the officer. I would talk to the 17 officer. Any documentation that's relevant to 18 whatever happened, I would gather those documents. 19 Q. Okay. And would you then make a 20 recommendation to the -- 21 A. After I had finished everything that I 22 to do, then I would make a recommendation. 23 Q. And who would you make a recommendation to? 24 A. To the sheriff. 25 Q. To the sheriff?</p>	<p>1 have haven't looked at it in a long, long time. So -- 2 how long MS. ROBINSON: Michael, can we get the 3 use-of-force policy pulled up. 4 Was there ROBINSON: 5 Take a moment to look over it, if you w 6 A. Okay. 7 What do you Okay. Can you read the name at the bot 8 of this policy, Vance County. 9 A. Vance County Sheriff's Office Policy Ma 10 panel? Would Okay. And then can you identify this 11 policy. 12 A. Like, read from the bottom line? 13 Q. No. At the directive. Which directive 14 in this? Look in the top right-hand corner, Mr. Bul 15 I would A. Oh, I can't see the top right-hand corn 16 talk to the Q. Oh, you don't have it in front of you? 17 A. Directive B.9. 18 documents Q. Okay. And what's the effective date of 19 a policy? 20 A. 7-15-2009. 21 that I know And so it's safe to say this is Vance 22 County's use-of-force policy? 23 (The witness nodded head.) 24 Q. Have you had a chance to review the che 25 agents section of this policy on Page 1?</p>	

Page 46	Page 48
<p>1 MR. GEIS: Is this an exhibit that BY MS. ROBINSON: 2 MS. ROBINSON: This is Exhibit 2 Number 3 Q. Mr. Bullock, you've had an opportunity 3 MR. GEIS: Okay. It would be helpful to review this document? 4 mark these exhibits. 4 A. Yes, ma'am. 5 MS. ROBINSON: They will be. 5 You know, Q. Okay. And can you define what this doc 6 honest to God, you-all didn't mark 6 any exhibits. 7 I will say that. 7 A. It's the documents that contained some 8 MR. GEIS: It would be helpful to information from my administrative investigation 9 exhibits so we know what we're talking 9 Deputy White's actions pertaining to use of force 10 MS. ROBINSON: We will. We will. 10 against Latwanya Oliver. 11 (Exhibit 3 was marked for identification.) MS. ROBINSON: Okay. Let the record re 12 MR. GEIS: If you could put Number 3 on the 12 that the witness has identified what should 13 bottom of that. Do you need a pen 13 marked as Exhibit 4. 14 THE WITNESS: Okay. 14 (Exhibit 4 was marked for identification.) 15 BY MS. ROBINSON: 15 BY MS. ROBINSON:</p>	
<p>16 Q. Have you had a chance to review 16 the chemical Do you recall this incident? Do you re 17 agents? 17 drafting this document? 18 A. Yes, ma'am. 18 A. Yes. 19 Q. And do you mind reading that 19 second bullet? Okay. Can you explain to me the proces 20 A. "Prior to issuance of Oleores 20 Capsicum you employed when conducting this investiga 21 Spray (OC Spray), all deputies shall receive training I gathered up the use-of-force report, 22 in its use, which will include instruct 22 on an incident report, the information that was obtained 23 application to afford the deputy an under 23 standing of Ms. Oliver, the information that was obtained 24 the effects. Any use of OC Spray other 24 than from the hospital. I listened to the 911 tapes, 25 training situation or spraying of animal 25 recordings. I conducted interviews.</p>	
Page 47	Page 49
<p>1 self-protection shall be reported, as re 1 quired by Q. This So Ms. Oliver filed a complaint? Is th 2 policy." 2 what you're saying? 3 Q. Okay. And as someone who evaluates use 3 of Yes. Ms. Oliver filed a complaint. 4 force, what does that sentence mean -- 4 on those Q. Okay. When did she -- do you recall wh 5 sentences mean? 5 she filed that complaint, that written complaint? 6 A. That you can only carry the made that the I don't know the day. 7 sheriff's office issues you, and you have 7 to have Q. On the date of the incident, the date a 8 proof that you've been trained, and you 8 can't the incident? 9 animals. 9 A. It was within that same week, but I don 10 Q. Okay. Okay. I want to -- I'm going to come 10 when she did it. 11 back to this policy, so just kind of leave 11 it out Q. If Okay. So after she filed a written 12 you will. 12 complaint, what occurred next? How was this comp 13 But for now, I want to talk some 13 about the 14 incident that you investigated in terms 14 of Mr. White. She may have talked to Captain Watkins. 15 Okay? 15 would have talked to Mr. White. I talked to his 16 MS. ROBINSON: Michael, can we get super 16 supervisors. I gathered the documents that I jus 17 report up. 17 mentioned before. 18 BY MS. ROBINSON: 18 Q. So who do you recall speaking to? 19 Q. Can you take a minute and review that 19 A. I recall speaking to Mr. White. I reca 20 document, please. 20 speaking to Lieutenant Goolsby, Sergeant Welborn, 21 MS. ROBINSON: Chris, while he's 21 Captain Watkins, Ms. Oliver. 22 that document, I'm just going to go 22 get a refill In order to get the reports from 911, I 23 on coffee. 23 would have spoken to somebody at 911, but I don't 24 MR. GEIS: Okay. 24 who. I'm sure at some point in time, I talked to 25 (Recess in proceedings from 11:50 to 25 11:55 a.m.)</p>	

Page 50	Page 52	
<p>1 Q. Let's go to -- I think it should be Page 2 2 and 3 of that report. I'm going to come back and ask 3 you questions about these conversations, but I want 4 you to go to Page 2 and 3 of the report. It 5 illustrates what you based your decision on. 6 Do you see Mr. White's statement listed? 7 A. It seems like the first -- are you referring 8 to when he first said, "All hell broke loose?" 9 Q. No. Page 2 and 3 where it says 10 "illustrations," your conclusion. 11 A. All right. 12 Q. Right above your conclusions. 13 A. Okay. And what was the question? 14 Q. The question is, this isn't -- these are 15 illustrations of which you based your decision on. 16 correct? 17 A. Yes. 18 Q. Okay. Do you see Mr. White's statement 19 listed? 20 A. Yes. 21 Q. Where is Mr. White's statement? 22 A. It's -- what he wrote was in the use of 23 report -- use of -- I mean the incident report 24 1801-3870 and a use-of-force report. 25 Q. Okay. So are those the investigations that</p>	<p>2 and 3 of that report. I'm going to come back and ask 3 you questions about these conversations, but I want 4 you to go to Page 2 and 3 of the report. It 5 illustrates what you based your decision on. I don't know exactly what day and time 6 that was on there. I don't know the exact date a 7 you referring to. Okay. That's fair. What -- how -- what 8 occurred during that conversation? What transpired 9 A. He -- he sat down in my office and told 10 what he had -- you know, his point of view of what 11 happened. And I listened, and then we -- I continued 12 on with the investigation. 13 Q. Did you take notes? 14 A. I would imagine that I did. I don't have 15 notes, but I would imagine that I did, but I 16 know that to be factual. I might have been typing 17 the time. I don't know. I don't remember. 18 Q. But there would have been typewritten notes 19 A. I'm sorry? 20 Q. There would have been typewritten notes 21 A. I'm saying I might have been -- I don't 22 use if I was typing little snippets at the time. I 23 don't remember. I don't know if I was typing or 24 writing. I don't remember. 25 Q. And what did he say occurred?</p>	
Page 51	Page 53	
<p>1 you had with Mr. White? 2 A. Are those the what? 3 Q. Investigations that you had with Mr. White. 4 A. I don't understand your question. 5 Q. Did you have direct conversations with 6 Mr. White, or did you base it on these use-of-force 7 reports and the incident report? 8 A. Yes. I had direct conversations with 9 Mr. White. 10 Q. But your conclusion wasn't based on that 11 direct conversation? 12 A. It was based on everything I had gotten, 13 either through talking or whatever was written following -- 14 was based on everything that I compiled in order to 15 produce this report and make a recommendation first. He tried to put the handcuffs on her. I 16 Q. But it's not noted on this document is that 17 fair to say? 18 A. Is what not noted? 19 Q. Your conversations with Mr. White. 20 A. It's not fair to say because I quoted him, and he couldn't tell me. 21 the things he said. 22 Q. Okay. So let's go back to your statements 23 with -- or your conversations with, you said, 24 Mr. White. Let's start with Mr. White. 25 How did that conversation go?</p>	<p>1 A. I don't know that I can summarize it. 2 don't know verbatim. You know, he basically saw 3 the day before. He turned around on it. 4 think he ran the registration. He confronted the 5 her about her speeding. She became verbal with 6 use-of-force. I think she -- he got back out, 7 to the office. He realized there was warrants. 8 went to the house to try to serve the warrants or 9 to the house to try to make contact with her. I 10 called it an investigation at first. He did not 11 make contact. His shift ended. 12 had gotten, He came back the following shift or the 13 written following -- the next day or night. He went there 14 in order to check on the warrants. She seemed cooperative at 15 first. He tried to put the handcuffs on her. I 16 something about she wouldn't let him get 17 handcuffs on her, and he -- he said he performed 18 takedown maneuver. 19 I asked him what takedown maneuver he 20 performed, and he couldn't tell me. 21 Q. And how long did this conversation last 22 I don't recall. 23 Q. Was it a half day? Was it an hour 24 conversation? 25 When did you</p>	

Page 54	Page 56
<p>1 Q. Was Mr. White the first person who you spoke 2 to about this incident? 3 A. No. 4 Q. Who was the first person? 5 A. It might have been Sergeant Welborn or 6 Lieutenant Goolsby. 7 Q. What did they tell you? 8 A. I don't know. I don't remember what they 9 told me. I have the incident report. You know, I 10 as a standard practice, I checked with the supervisor 11 to make sure they were aware of it and 12 remember what they told me. 13 Q. Was it an in-person meeting or a phone call? 14 A. I don't remember. 15 Q. You don't remember? You don't remember for 16 either of them? 17 A. No. At some point in time, they were in 18 in my office talking, but whether or not that was the 19 first time or not, I don't know. And they were in 20 office talking when Mr. White was in the office with 21 me. I mean, they were in the office present when 22 Mr. White was in the office with me. 23 Q. Okay. So your testimony is that Welborn and 24 Goolsby were -- Welborn and Goolsby and Mr. White 25 spoke to them all at once?</p>	<p>When you say "they," who are you referring 2 to? 3 Q. Welborn, Goolsby. 4 A. No. I don't remember what they said to 5 me. I don't remember what I said. You know, again, a 6 part of my -- during this investigation, I always 7 checked with the supervisors to make sure they are 8 aware of what's going on, but I don't know exactly 9 what they said. 10 Q. Got you. Well, you said you spoke to 11 Mr. Watkins. 12 What did that conversation -- 13 I don't remember the details, but what 14 remember about Mr. Watkins' conversation is he was 15 initially spoke to Ms. Oliver, and that's 16 I remember about that. 17 Q. Okay. You said you had a conversation 18 with Sheriff White? 19 Yes. 20 Q. Do you recall that conversation? 21 A. As I complete the investigation, I let 22 know that I've completed it. I let him know I 23 completed it, and then I turn it over to him, and 24 he takes it. 25 Q. So that was the extent of your conversation?</p>
Page 55	Page 57
<p>1 A. At some point in time, I was in my office 2 point in time, they were in my office together at some 3 point in time. That's the point in time that a part 4 actually spoke to Goolsby and Welborn without 5 Mr. White being in my presence. Whether that was 6 the phone or in my office or in their office, I 7 don't recall when. 8 Q. What did you say when you spoke to them 9 outside of Mr. White's presence? 10 A. I don't recall what I said. 11 Q. Can you tell me what you do recall about 12 this investigation. Just kind of walk me through it. 13 A. I remember having knowledge of the incident 14 report. I remember having seen a statement by 15 Ms. Oliver. I remember talking to Captain Watkins. 16 I can remember talking to Lieutenant Goolsby. 17 I remember talking to Sergeant Welborn. 18 I remember talking to Mr. White in my office with 19 Goolsby and Sergeant Welborn, and I can remember 20 gathering the documents for this report. 21 And I remember taking -- once the investigation is 22 taking the report to the sheriff with the 23 recommendation. 24 Q. Okay. But you can't remember what you said 25 to them or what they said to you?</p>	<p>1 A. When I do these investigations, I let him 2 know that I was doing it, because it's 3 a part of my standard operating procedure to do that 4 things. But when I'm done, I let him know that I 5 have completed it, and he'll -- you know, I'll say to 6 him, "I've completed the investigation, and he'll flip through it as I'm 7 talking to him. And I tell him what the 8 recommendation is, and then I leave. I didn't have 9 anything to do with it after that -- 10 Q. Okay. 11 -- except this report. 12 Q. Okay. Well, we spoke generally. I'm trying to 13 speak more specifically about this incident. 14 What can you recall you said to Sheriff White, what 15 can you recall you did. 16 A. I recall letting him know that I've 17 completed it, and I recall giving it to him. 18 Q. And he didn't ask you what's your -- did he 19 ask you what the outcome was? 20 A. As we're -- as he's talking, he saw what 21 the recommendation is. You know, I pointed out what 22 the recommendation is as it reads. 23 Q. Okay. And what did he say? 24 I don't know what he said. 25 Q. You don't know?</p>

Page 58	Page 60
<p>1 A. I don't remember staying around to talk 2 about anything.</p> <p>3 Q. So you recommended that -- you recommended 4 that Deputy White be terminated, correct?</p> <p>5 A. I don't use those terms, so that's 6 correct.</p> <p>7 Q. What term did you use? Well, let's read the 8 recommendation. So pull up the document, please. 9 Let's read your -- can you, please, read your 10 recommendation.</p> <p>11 A. "It is the recommendation of Captain 12 Watkins, Lieutenant Goolsby, Sergeant Weldon 13 investigator officer that Deputy Justin White 14 service with the Vance County Sheriff's Office 15 longer needed."</p> <p>16 Q. Okay. So the effect is termination, right?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And can you explain to me how you 19 reached this recommendation, this conclusion?</p> <p>20 A. He slammed the victim and broke her arm.</p> <p>21 Q. So what did you base your decision on? What 22 rule? What policy?</p> <p>23 A. Use-of-force, Directive B.9I.</p> <p>24 Q. And how did you come to the conclusion that 25 he violated that policy?</p>	<p>2 any training that law enforcement officers have. 3 It trained to slam people down on the ground 4 control techniques.</p> <p>5 Q. Okay. Tell me about some of those sub 6 A. He could have done an arm bar takedown. 7 He could have done a leg sweep. He could have done 8 wrist come-along.</p> <p>9 Q. Can you explain to me what's an arm bar 10 technique.</p> <p>11 A. Basically, when you have a person by the 12 arm and the arm straight, you then kind of actually 13 White to the arm and put them down on the ground and 14 cuffs them.</p> <p>15 Q. Okay. Do you know -- do you know if 16 Mr. White did not perform an arm bar technique?</p> <p>17 A. Yes, I do. He slammed her down on the 18 ground. The arm bar technique doesn't require you 19 slam anybody.</p> <p>20 Q. Who said Mr. White slammed Ms. Oliver t 21 How did you make that conclusion? How d 22 you conclude that?</p> <p>23 A. Ms. Oliver said that Mr. White slammed 24 her on the ground.</p> <p>25 Q. So I asked you earlier about how many</p>
Page 59	Page 61
<p>1 A. He slammed the lady to the ground and 2 her arm.</p> <p>3 Q. Okay. Earlier you testified that you 4 investigated brandishing and actual shootings before, 5 correct?</p> <p>6 A. That's correct.</p> <p>7 Q. All right. Let's talk about some of those 8 Do you always recommend departure or 9 separation -- let's call it separation since you don't 10 like "termination" -- separation from employment when 11 someone is injured?</p> <p>12 A. I don't always recommend it.</p> <p>13 Q. Okay. When do you recommend separation?</p> <p>14 A. When I feel that they violated policy.</p> <p>15 Q. You just feel it?</p> <p>16 A. Sorry?</p> <p>17 Q. You just feel it? You just get a feeling, 18 "I'm --"</p> <p>19 A. No. I didn't say "feeling." I said I 20 they -- when I see that they violated policy.</p> <p>21 Q. Okay. And in your opinion, what could 22 Mr. White have done differently?</p> <p>23 A. He certainly shouldn't have slammed her 24 broke her arm. He could have used his voice to try 25 get her under control, or he could have used</p>	<p>1 use-of-force investigations have you conducted. 2 said very many, correct?</p> <p>3 A. Yes.</p> <p>4 Do you substantiate the majority of the 5 based on a suspect's testimony or statement?</p> <p>6 A. I don't know. I don't have a working m 7 many are substantiated and how many 8 unsubstantiated. I have not kept -- there have b 9 have been exonerated. There have been 10 have been substantiated. Like, I don't 11 know the -- you know, the difference. I don't kn 12 the tally.</p> <p>13 Q. Okay. Have -- did you discuss this 14 investigation with anyone other than those person 15 you identified?</p> <p>16 A. Yes.</p> <p>17 Q. Who?</p> <p>18 A. I discussed it with Mr. Geis, and I 19 discussed it with Lawrence Bullock.</p> <p>20 Q. I don't want to know what you told Mr. 21 But what discussions did you have with 22 Bullock?</p> <p>23 A. After this suit came out, you know, he 24 called me and said, "Hey, you know, J.J., why are</p>

<p style="text-align: right;">Page 62</p> <p>1 suing us?"</p> <p>2 I said, "For what?"</p> <p>3 He said, "Well, you talked about</p> <p>4 talked about this." But I'm not -- you</p> <p>5 know what thing he was saying, because he</p> <p>6 get it at the same time he got it. I got</p> <p>7 later -- you know, I live out of town, so</p> <p>8 before I got it, before they got it.</p> <p>9 So he was wherever before I got</p> <p>10 discussed it in that manner. That's it</p> <p>11 Q. What did you-all say?</p> <p>12 A. "Hey, we're being sued. We got</p> <p>13 talk --" You know, I think we -- arrange</p> <p>14 made for us to meet with our attorney.</p> <p>15 That's about the gist of it.</p> <p>16 Q. Do you recall the length of that</p> <p>17 conversation?</p> <p>18 A. I don't.</p> <p>19 Q. Do you recall --</p> <p>20 A. It would -- it would -- no.</p> <p>21 that conversation.</p> <p>22 Q. How many times have you-all discussed</p> <p>23 suit since?</p> <p>24 A. The times we've discussed the</p> <p>25 first time he told me about it is how many times</p>	<p style="text-align: right;">Page 64</p> <p>1 force.</p> <p>2 Q. Deadly force?</p> <p>3 A. Uh-huh.</p> <p>4 Q. But even if it's just brandished, you s</p> <p>5 have to report it?</p> <p>6 A. No. Because the deputy wears a uniform</p> <p>7 that gun is seen all the time, so that -- to see i</p> <p>8 simply wouldn't be something you have to report.</p> <p>9 Q. Okay.</p> <p>10 A. Just if you see a gun. But if you were</p> <p>11 put your hands on it and draw it, then that would</p> <p>12 something you would have to report.</p> <p>13 Q. Okay. Okay. And that was something th</p> <p>14 would be run by you also?</p> <p>15 A. Say that again.</p> <p>16 Q. That report would be run through you in</p> <p>17 cases or in certain cases?</p> <p>18 A. What report?</p> <p>19 Q. If an officer drew a gun.</p> <p>20 don't recall Not necessarily.</p> <p>21 Q. Not -- okay. So we talked about this</p> <p>22 discuss it. So when are soft hands to be used?</p> <p>23 Because you said you got a presence, you had a ve</p> <p>24 you have soft hands, pepper spray, force, and dea</p> <p>25 force.</p>
<p style="text-align: right;">Page 63</p> <p>1 I've met with him and Mr. Geis and Mr.</p> <p>2 White. I don't know how many times that</p> <p>3 Q. Okay.</p> <p>4 A. All the discussions have been</p> <p>5 time.</p> <p>6 Q. Okay. Okay. And those are the only persons</p> <p>7 who you discussed this incident with?</p> <p>8 A. Those are the only persons I</p> <p>9 incident with.</p> <p>10 Q. Okay. Are you familiar with the</p> <p>11 use-of-force continuum?</p> <p>12 A. Vaguely. Again, over time, I</p> <p>13 that stuff has faded out of my memory.</p> <p>14 it to you exactly. I know it, and I recognize</p> <p>15 I can see it. I recognize it.</p> <p>16 Q. Okay. I don't want you to quote it</p> <p>17 I just kind of want you to explain the</p> <p>18 someone who made use-of-force calls.</p> <p>19 A. The continuum starts with presence and</p> <p>20 verbal and then soft hands, hard hands.</p> <p>21 other, like, techniques like mace and pepper spray,</p> <p>22 and then you have deadly force.</p> <p>23 Q. Where does a firearm fit in a</p> <p>24 the continuum?</p> <p>25 A. If it's discharged, it would</p>	<p style="text-align: right;">Page 65</p> <p>1 and Sheriff Soft hands would be the -- grabbing</p> <p>2 somebody's wrist or hand, placing their hands beh</p> <p>3 their back and handcuffing them. That would be a</p> <p>4 example of soft hands. Sometimes deputies place</p> <p>5 handcuffs on the front of somebody. That would b</p> <p>6 persons. Soft hands could be you're guiding</p> <p>7 somebody, just holding their shoulder and just wa</p> <p>8 discussed them. That could be soft hands.</p> <p>9 Q. Okay. And according to the continuum,</p> <p>10 the hands is less intrusive than lethal weapons, such</p> <p>11 batons and Tasers and pepper spray; is that corre</p> <p>12 A. What's the question?</p> <p>13 Q. Are soft-hand techniques -- according t</p> <p>14 continuum, a soft-hand technique is less intrusiv</p> <p>15 less of a measure than weapons such as batons, Ta</p> <p>16 it and pepper spray?</p> <p>17 Ma'am, I don't have that continuum to -</p> <p>18 can't answer that without actually looking at the</p> <p>19 continuum. My law enforcement time has ended, an</p> <p>20 don't keep things in memory. I will have to look</p> <p>21 it up.</p> <p>22 Q. Okay. Okay. When did your law enforce</p> <p>23 of times end?</p> <p>24 A. I retired in April 2019.</p> <p>25 Q. And you lost 20-something years of</p>

Page 66	Page 68
<p>1 experience?</p> <p>2 A. Yes. I don't -- I can't keep</p> <p>3 every little thing that has happened and</p> <p>4 learned over the years. I know what the</p> <p>5 it looks like, but I don't know that I'm</p> <p>6 in the exact order.</p> <p>7 Q. Okay. Okay. So does the Vance</p> <p>8 Sheriff's Office follow the BLET? You</p> <p>9 BLET training.</p> <p>10 A. Yes.</p> <p>11 Q. The Vance County Sheriff's Office</p> <p>12 follow BLET? Okay. I'm going to pull</p> <p>13 policy, and I want to -- I just want to</p> <p>14 a certain page of it. Okay? And Mr. Geis</p> <p>15 MR. GEIS: Which exhibit is this?</p> <p>16 number?</p> <p>17 MS. ROBINSON: We're marking</p> <p>18 Exhibit Number 5.</p> <p>19 (Exhibit 5 was marked for identification.)</p> <p>20 BY MS. ROBINSON:</p> <p>21 Q. If you can just turn to Page</p> <p>22 MS. ROBINSON: Michael, can we</p> <p>23 I want to see something right quick</p> <p>24 to start at 36 and 37.</p> <p>25 And, Mr. Geis, if it's okay with you,</p>	<p>1 soft-hand technique other than the one at issue?</p> <p>2 In my head. I don't know if you consider a person o</p> <p>3 that as a soft-hand technique, so I can't compa</p> <p>4 use that what I consider to be a soft-hand techniq</p> <p>5 naming the. Okay. Okay. Well, let's just ask a mo</p> <p>6 general question.</p> <p>7 Have you ever or can you recall an inci</p> <p>8 talked about which you recommended separation when an offic</p> <p>9 employed a soft-hand technique?</p> <p>10 A. I don't recall any right now.</p> <p>11 Q. Have you ever recommended separation wh</p> <p>12 employed a soft-hand technique?</p> <p>13 A. I don't recall that right now.</p> <p>14 Q. You -- let's go back to what was marked</p> <p>15 Exhibit Number 4, and that is your report.</p> <p>16 A. I have it.</p> <p>17 Q. You have your report in front of you?</p> <p>18 A. I have it.</p> <p>19 Q. You have it? Okay. You said that in y</p> <p>20 conclusion -- do you mind reading that next -- th</p> <p>21 next to the last sentence where it says, "Deputy</p> <p>22 could have used other options."</p> <p>23 I'm going "Deputy White could have used other opt</p> <p>24 prior to slamming Oliver to the ground. Deputy W</p> <p>25 And, Mr. Geis, if it's okay with you,</p>
Page 67	Page 69
<p>1 once I wrap this up, can we take a</p> <p>2 MR. GEIS: Yes.</p> <p>3 MS. ROBINSON: Okay.</p> <p>4 MR. GEIS: Are you ready?</p> <p>5 THE WITNESS: Okay. I'm sorry</p> <p>6 BY MS. ROBINSON:</p> <p>7 Q. Okay. So this is a -- this po</p> <p>8 you tell us what this policy describes.</p> <p>9 A. I don't know this to be a policy.</p> <p>10 Q. Technique. What this technique describes</p> <p>11 A. On Page 36, it starts off with</p> <p>12 Is that what you're referring</p> <p>13 Q. The quick takes.</p> <p>14 A. The first one is bent wrist.</p> <p>15 is arm bar. The third one is multiple</p> <p>16 takedown. The fourth one is close quarter</p> <p>17 Q. And isn't it true that someone</p> <p>18 accidentally injured in any of these methods</p> <p>19 A. In a few.</p> <p>20 Q. Have a deputy -- has a deputy</p> <p>21 injured a citizen under your leadership</p> <p>22 A. I don't have anything coming</p> <p>23 now.</p> <p>24 Q. Can you recall an incident where you</p> <p>25 recommended separation for an officer who</p>	<p>1 lunchtime because Oliver was wearing glasses an</p> <p>2 moving uncontrollably. Deputy White's takedown</p> <p>3 maneuver was contrary to policy in that it caused</p> <p>4 fracture of the humerus bone in her left arm."</p> <p>5 I'm ready. Okay. Okay. So let's tease that apart a litt</p> <p>6 bit.</p> <p>7 Policy -- can Was the maneuver contrary to policy bec</p> <p>8 it caused a fracture?</p> <p>9 A. The maneuver was a slamming, and we don</p> <p>10 anything in our policy or training that allo</p> <p>11 anything quick to slam anybody.</p> <p>12 Q. Okay. Well, this doesn't say that the</p> <p>13 maneuver was a slamming and is contrary to policy</p> <p>14 The does it not?</p> <p>15 A. No.</p> <p>16 Q. Okay. This makes it seem as if the inj</p> <p>17 can be what was contrary to policy. I have -- I want</p> <p>18 ask you about mace. You said that Deputy White c</p> <p>19 have used mace or pepper spray.</p> <p>20 accidentally Are there any dangers associated with t</p> <p>21 use of pepper spray?</p> <p>22 mind right I have never experienced any danger tha</p> <p>23 associated with the use of mace. I have not</p> <p>24 experienced that.</p> <p>25 Q. You haven't? So you have -- you've use</p>

Page 70	Page 72
<p>1 force.</p> <p>2 Have you completed an excessive</p> <p>3 before?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. We'll get back to that.</p> <p>6 Has a citizen ever had an adverse reaction</p> <p>7 to pepper spray?</p> <p>8 A. I don't know of any citizen having</p> <p>9 adverse reaction to pepper spray that I</p> <p>10 involved in. Do I -- do I -- I don't know of any that</p> <p>11 comes to mind right now that I am aware</p> <p>12 having other than sometimes you -- they</p> <p>13 it? I'm at a loss of words. Not hyper-</p> <p>14 but -- I can't think of the word that I</p> <p>15 Over excitedly and panic -- panic, yeah</p> <p>16 attacks.</p> <p>17 Q. Okay. And if -- even if someone had, say,</p> <p>18 asthma, that could be harmful, correct?</p> <p>19 A. I don't know that to be the case.</p> <p>20 Q. You don't know that to be --</p> <p>21 A. I don't know if anybody who had</p> <p>22 been sprayed that had a harmful effect.</p> <p>23 of anybody. I don't have any personal</p> <p>24 Q. Okay. Do you -- I want to put</p> <p>25 use-of-force policy up again, so --</p>	<p>1 control arrest continuum?</p> <p>2 force report No. I'm not saying that. I answered t</p> <p>3 question about the -- Vance County following BLET</p> <p>4 training. I said yes.</p> <p>5 Q. Okay.</p> <p>6 Just the way you phrased it to me, does</p> <p>7 Vance County deputies go to BLET training, and I</p> <p>8 have been</p> <p>9 Q. Okay. Well, let me ask this question.</p> <p>10 Does the Vance County Sheriff's Office</p> <p>11 follow the BLET subject control arrest techniques</p> <p>12 continuum?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Does Vance County follow the BLET</p> <p>15 policies and procedures?</p> <p>16 A. I don't know what their policies and</p> <p>17 procedures are.</p> <p>18 Q. Okay. So you said that you have been</p> <p>19 involved in use of force -- the subject of a</p> <p>20 use-of-force investigation yourself?</p> <p>21 Yes.</p> <p>22 I don't know Can you explain that to me. How many t</p> <p>23 How many times have you been the subject of a</p> <p>24 use-of-force investigation?</p> <p>25 A. Between 5 and 15.</p>
Page 71	Page 73
<p>1 A. Is it Number 3?</p> <p>2 Q. Yes, that's Exhibit Number 3.</p> <p>3 MS. ROBINSON: Let's go down.</p> <p>4 down some, Michael. That's not what I'm looking</p> <p>5 for. Hold on. Go back up. Go back up. Right --</p> <p>6 here. Up, up, up. Right -- right there. Give</p> <p>7 me a second to find the exact sentence. strike on an individual, and I hit him in the head</p> <p>8 Let's pull up the BLET policy, and that</p> <p>9 is Exhibit Number 5.</p> <p>10 BY MS. ROBINSON:</p> <p>11 Q. We already discussed that the use of a clavicle strike?</p> <p>12 chemical dispersant was not a substitute for a soft</p> <p>13 technique, correct?</p> <p>14 A. I don't -- I don't recall --</p> <p>15 that.</p> <p>16 Q. On the continuum of force.</p> <p>17 A. I don't recall saying that.</p> <p>18 Q. But you do recall saying that Vance County</p> <p>19 employs the BLET's techniques in subject control</p> <p>20 arrests?</p> <p>21 A. No. You asked me did Vance County follow</p> <p>22 the training, have BLET training, follow BLET</p> <p>23 training. And I said yes to that.</p> <p>24 Q. So are you saying that Vance County</p> <p>25 Sheriff's Office does not follow the BLET</p>	<p>1 Q. 5 and 15 times? Can you explain those</p> <p>2 incidents to me.</p> <p>3 Let's scroll What occurred?</p> <p>4 I'm looking I pepper-sprayed people. That caused m</p> <p>5 up. Right be the subject of use of force. There wa</p> <p>6 there. Give that I had -- I was trying to do a clavicle</p> <p>7 strike on an individual, and I hit him in the head</p> <p>8 Those were the times.</p> <p>9 Q. Okay. Let's unpack that some.</p> <p>10 So you were saying you were trying to d</p> <p>11 use of a clavicle strike?</p> <p>12 Yes.</p> <p>13 Q. Explain what that is.</p> <p>14 I don't recall I was trying to get a subject under con</p> <p>15 by striking him in the clavicle. That's no longe</p> <p>16 allowed. That was my early training that initial</p> <p>17 allowed it, and now it's no longer allowed.</p> <p>18 So you struck the individual in the head</p> <p>19 A. Yes.</p> <p>20 Q. Was the individual injured?</p> <p>21 No.</p> <p>22 Q. Did the individual complain?</p> <p>23 A. No. I had to report it as a part of my</p> <p>24 reporting.</p> <p>25 Q. And so you used pepper spray on individ</p>

Page 74	Page 76	
<p>1 Can you tell me about those instances.</p> <p>2 A. I've had several occasions tried to arrest</p> <p>3 people who resisted, and I had to pepper spray them.</p> <p>4 Q. By "resist," what do you mean?</p> <p>5 people attack you?</p> <p>6 A. I mean, there have been multiple incidents.</p> <p>7 I've had a situation where I tried to arrest somebody.</p> <p>8 I tried to get them to push off of me, and the I-- at your investigations in which you were t</p> <p>9 sprayed them. There's been incidents where, subject of an excessive force investigation, and</p> <p>10 I tried to get the subject out of a car. I'd like to do is to shift a little bit into -- a</p> <p>11 to come out of the car, and I had to spray you familiar with the concept of 20/20 hindsight?</p> <p>12 Q. Have you ever used any soft-hand techniques Can you explain it.</p> <p>13 over chemical dispersants?</p> <p>14 A. Yes.</p> <p>15 Q. Can you explain those instances.</p> <p>16 A. Ma'am, I've arrested -- I can't put hindsight -- and Mr. Geis can tell you this too -</p> <p>17 on the people I've arrested and I grabbed their by the</p> <p>18 hand, put their arms behind their back, and I arrested MR. GEIS: Here we go now.</p> <p>19 them. That's one of the soft-hand approaches. And MS. ROBINSON: Huh?</p> <p>20 I've put my hands on people to arrest them. MR. GEIS: Oh, nothing.</p> <p>21 Q. Okay. But that's pretty common.</p> <p>22 A. Yes.</p> <p>23 Q. Do you put your hands on --</p> <p>24 A. For me.</p> <p>25 Q. Okay. Did any of these use-of force</p>	<p>I have to go to the restroom. Do you k</p> <p>Q. No. We can actually break for lunch no</p> <p>Did not long -- can we go of the record.</p> <p>(Recess in proceedings from 12:53 to 2:06 p.m.</p> <p>BY MS. ROBINSON:</p> <p>Q. Mr. Bullock, I think we -- we left off</p> <p>the I-- at your investigations in which you were t</p> <p>subject of an excessive force investigation, and</p> <p>I'd like to do is to shift a little bit into -- a</p> <p>you familiar with the concept of 20/20 hindsight?</p> <p>Can you explain it.</p> <p>Q. So, typically -- and it might be in som</p> <p>your policies. You know, some of the policies fo</p> <p>Vance County quote Supreme Court authority. But</p> <p>hindsight -- and Mr. Geis can tell you this too -</p> <p>MR. GEIS: Here we go now.</p> <p>MS. ROBINSON: Huh?</p> <p>MR. GEIS: Oh, nothing.</p> <p>BY MS. ROBINSON:</p> <p>Q. -- is a concept in which you, looking b</p> <p>could have maybe done something differently but</p> <p>weren't necessarily unreasonable.</p> <p>Are you familiar with that concept?</p>	
Page 75	Page 77	
<p>1 instances in which you were a subject in result in any</p> <p>2 type of investigation?</p> <p>3 A. When I was a deputy at the time, I had to</p> <p>4 write a use-of-force report. I had to talk to the evaluation of Mr. White?</p> <p>5 captain at the time, and then I haven't heard anything.</p> <p>6 else from it since those -- then.</p> <p>7 Q. And this occurred at the Vance County</p> <p>8 Sheriff's Office, correct?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Does the Vance County Sheriff's Office train</p> <p>11 officers on the use of force?</p> <p>12 A. We have BLET update that mandates training.</p> <p>13 that we go through, and we have a training course</p> <p>14 that takes us through those legal updates.</p> <p>15 what it was when I was here. I don't know what it is</p> <p>16 now.</p> <p>17 Q. All right. Who was the training officer?</p> <p>18 A. It's Captain Shelton.</p> <p>19 Q. And what would he train the officers on?</p> <p>20 What techniques?</p> <p>21 A. He would go through the arm bar techniques</p> <p>22 You know, the chin strike has to be a little bit</p> <p>23 simulated because it's -- you don't want anybody's</p> <p>24 chin being struck. We would go through the subject</p> <p>25 takedown subject control techniques.</p>	<p>I understand how you explained it to me</p> <p>2 understand what you're saying.</p> <p>Q. Okay. Okay. Did that at all factor in</p> <p>your evaluation of Mr. White?</p> <p>No.</p> <p>Q. No? Okay. Why not?</p> <p>A. You're asking me about the concept of 20</p> <p>hindsight. At the time I did Mr. White's</p> <p>9 investigation, 20/20 hindsight wasn't in my mind.</p> <p>10 I don't have any bearing on my decision -- on my</p> <p>11 recommendation. Not decision, but recommendation</p> <p>12 Q. Okay. Another question I had -- we tal</p> <p>13 about the reports that you relied on or the state</p> <p>14 That you relied on.</p> <p>15 Did -- were they all written statements</p> <p>16 Goolsby and Welborn made written statements, prov</p> <p>17 written statements?</p> <p>18 A. I believe they did.</p> <p>19 Q. Okay. Earlier in the morning, probably</p> <p>20 early in the morning, you talked about the use of</p> <p>21 canines in conjunction with incident reports.</p> <p>22 A. I don't recall using the word "canines.</p> <p>23 anybody's</p> <p>24 Q. Well, is a canine a use of force or</p> <p>25 the subject -- would the use of a canine be subject t</p>	

Page 78	Page 80	
<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MS. ROBINSON: Michael, can you</p> <p>4 some questions.</p> <p>5 BY MS. ROBINSON:</p> <p>6 Q. So does the Vance County Sheriff's Office</p> <p>7 employ canine units and canine handlers?</p> <p>8 A. Yes. We did back then.</p> <p>9 Q. Back then? Okay. And so let me -- let me</p> <p>10 clarify this too. And I'll go on the record saying</p> <p>11 this, you know, as clearly as possible. I</p> <p>12 say will be outside of the scope of your</p> <p>13 Okay?</p> <p>14 A. Okay.</p> <p>15 Q. So just feel free, understanding that all of</p> <p>16 your answers speak for your knowledge and your</p> <p>17 there. Okay?</p> <p>18 And so do the deputies control</p> <p>19 animals?</p> <p>20 A. The canine handler -- each animal is</p> <p>21 assigned to one handler, and it's the handler's</p> <p>22 responsibility to control that dog.</p> <p>23 Q. And those handlers are trained to control</p> <p>24 their dogs?</p> <p>25 A. Yes.</p>	<p>1 the canines -- some of the canines also had a dual</p> <p>2 purpose in which they were used for drug-sniffing</p> <p>3 -- purpose to apprehend.</p> <p>4 Q. Okay. How do you--all train the canines</p> <p>5 sniff for drugs?</p> <p>6 Say that again. I'm sorry?</p> <p>7 Q. How do you train the canines to sniff</p> <p>8 identify drugs?</p> <p>9 I don't know, ma'am. I don't have any</p> <p>10 knowledge of that at all.</p> <p>11 Nothing you That was just a stray question.</p> <p>12 tenure there. Were any of the incidents known suspect</p> <p>13 that you can recall of?</p> <p>14 A. In what incidents?</p> <p>15 Where the canine has attacked someone,</p> <p>16 and they just -- were there any nonsuspects?</p> <p>17 A. Yes. A canine has bitten a handler.</p> <p>18 Q. And that's the only kind of nonsuspect</p> <p>19 situation?</p> <p>20 A. I don't -- you know, what's -- what's fresh</p> <p>21 in my memory is that, you know, we had a dog who</p> <p>22 often bite his handler. So that's fresh in my me</p> <p>23 mind there's -- I don't remember the details,</p> <p>24 think a lady got bit by a dog during a building s</p> <p>25 or doing an area search at an old school supply p</p>	
Page 79	Page 81	
<p>1 Q. Has there ever been an incident where a</p> <p>2 canine unit injured a citizen?</p> <p>3 A. Yes.</p> <p>4 Q. Can you describe these incidents to me.</p> <p>5 A. We've had -- in the process of taking</p> <p>6 subjects into custody where the -- the canine</p> <p>7 where the canine could be released to try to take</p> <p>8 subject in custody, the dog has bitten</p> <p>9 Q. Okay. So you said the dog has bitten</p> <p>10 subjects?</p> <p>11 A. Yes.</p> <p>12 Q. Is there a certain heightened</p> <p>13 which a canine unit will be brought out,</p> <p>14 misdemeanor, a felony, or --</p> <p>15 A. We've taken canines on situations where</p> <p>16 we've had to hunt for felons that may have run off</p> <p>17 the woods. And we've called out and gave them ample</p> <p>18 time to turn themselves in and say we're</p> <p>19 release the canine, and then the canine</p> <p>20 he's bitten people.</p> <p>21 We've had cases where we've taken a canine</p> <p>22 with us on drug raids. I can't recall any specific</p> <p>23 incident where, you know, they've bitten</p> <p>24 drug raids, but we use them there. And then the</p> <p>25 deputies use canines sometimes on traffic</p>	<p>1 that's sort of fresh in my mind, where the office</p> <p>2 thought the place was vacant and someone had got</p> <p>3 Q. Was -- did you investigate that handler</p> <p>4 A. I don't -- I don't think that came to m</p> <p>5 Q. Okay. Do you recall if that handler wa</p> <p>6 terminated?</p> <p>7 I do not.</p> <p>8 Q. Have there been instances in -- where t</p> <p>9 use of a canine has been considered excessive for</p> <p>10 A. It has not come to me, no. Not where i</p> <p>11 arose where it came to me.</p> <p>12 Q. But you've conducted investigations of</p> <p>13 like canine handlers?</p> <p>14 A. No.</p> <p>15 Q. You have not?</p> <p>16 A. No.</p> <p>17 Q. So that would go to someone else?</p> <p>18 A. Yes.</p> <p>19 Q. Like who?</p> <p>20 A. Probably the commander, whatever -- wha</p> <p>21 commander that would -- would have been wor</p> <p>22 any specific time who was supervising that officer.</p> <p>23 Q. Why wouldn't it rise to you? Why would</p> <p>24 rise to the level of you?</p> <p>25 A. -- It has never been put in practice. I m</p>	

 **AdvancedONE**
LEGAL

(866) 715-7770
advancedONE.com

(866) 715-7770
advancedONE.com

Page 90	Page 92
<p>1 Q. Yes.</p> <p>2 A. This is actually the field portion of the training, not the (audio interference) portion.</p> <p>3 THE REPORTER: What portion?</p> <p>4 THE WITNESS: Field portion, actual field training, out into the range and using the range. Usually, the range and range are used interchangeably.</p> <p>5 (Off-the-record statement by the reporter who)</p> <p>6 BY MS. ROBINSON:</p> <p>7 Q. So, Mr. Bullock, what we have on the screen now is your signature on the use-of-deadly-force</p> <p>8 handout.</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Okay. Can you read "C" for us, please?</p> <p>11 Well, first, before you do this, review the document.</p> <p>12 MS. ROBINSON: Michael, please scroll down so he can review this document. So we can see his signature. I can't</p> <p>13 THE WITNESS: Okay.</p> <p>14 BY MS. ROBINSON:</p> <p>15 Q. Is that your signature?</p> <p>16 A. Yes, ma'am.</p> <p>17 MS. ROBINSON: Exhibit 9.</p> <p>18 (Exhibit 9 was marked for identification.)</p> <p>19 BY MS. ROBINSON:</p>	<p>1 subsection only when it is or appears to be reasonable and necessary thereby to defend himself or a third</p> <p>2 person from what he reasonably believes to [be] t</p> <p>3 use of imminent use of deadly physical force; to</p> <p>4 attempt to escape from the custody of a person who he reasonably believes is</p> <p>5 attempting to escape by means of a deadly weapon</p> <p>6 who by his conduct or any other means indicates t</p> <p>7 he presents an imminent threat of death or serious</p> <p>8 physical injury to others unless apprehended with</p> <p>9 force; or to prevent the escape of a person from</p> <p>10 custody imposed upon him as a result of [a] convi</p> <p>11 for a felony."</p> <p>12 Q. Okay. So let's go back to what was marked</p> <p>13 The document, Exhibit 4, which was your investigation to</p> <p>14 Ms. Oliver's complaint.</p> <p>15 Okay.</p> <p>16 Q. Mr. White was serving two felony warrants</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. Mr. White informed you that Ms. Oliver</p> <p>20 assaulted him, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And under that policy that you just read</p> <p>23 could have used deadly force, correct?</p>
Page 91	Page 93
<p>1 Q. And do you recognize this document?</p> <p>2 A. Yes, ma'am. This is the document which we</p> <p>3 have found the training on about September 3</p> <p>4 2018, where Instructor Bartholomew signed it and where</p> <p>5 I signed it as a student.</p> <p>6 Q. Okay. And can you read "C."</p> <p>7 read -- let's go back to the --</p> <p>8 MS. ROBINSON: Scroll up some, Michael.</p> <p>9 BY MS. ROBINSON:</p> <p>10 Q. So this is the deadly force policy and</p> <p>11 handout?</p> <p>12 A. Yes, ma'am. This is what the instructor</p> <p>13 gives us to sign when we're in the classroom portion</p> <p>14 of the firearms qualification.</p> <p>15 Q. Okay. So let's read the use of force back into your memory very well, so let's see if al</p> <p>16 arrest. It says, "A law enforcement officer who is authorized to use force in these other conversations come back to your memor</p> <p>17 you can't finish -- can you finish that sentence the same way.</p> <p>18 me. On here it's "C," so --</p> <p>19 A. Start with "C"?</p> <p>20 Q. We want to read where it says "A law</p> <p>21 enforcement officer...." and then end with "C" that</p> <p>22 sentence.</p> <p>23 A. "A law enforcement officer is authorized to use force in these other conversations come back to your memor</p> <p>24 using deadly physical force upon another person for</p> <p>25 [the] purpose specified in Subdivision</p>	<p>1 A. No, ma'am.</p> <p>2 Q. She was a felon under "C." Read</p> <p>3 Subsection C.</p> <p>4 Under "C," ma'am, "to prevent the escape</p> <p>5 a person from custody imposed upon him as a resul</p> <p>6 Well, [a] felony conviction[]." She hadn't been convicted, and this is,</p> <p>7 Michael, used for people who are -- has a sentence</p> <p>8 imposed on them, like in the prison system. To s</p> <p>9 a nonviolent felony warrant is not justification</p> <p>10 use deadly force.</p> <p>11 Q. Okay.</p> <p>12 And she hasn't been convicted of any fe</p> <p>13 Q. Okay. So let's talk about that. That</p> <p>14 of force back into your memory very well, so let's see if al</p> <p>15 these other conversations come back to your memor</p> <p>16 sentence the same way.</p> <p>17 So you said that you interviewed Goolsb</p> <p>18 correct?</p> <p>19 A. No, ma'am. I never said I interviewed</p> <p>20 I said I talked with him. I said I tal</p> <p>21 with him, I talked with Sergeant Welborn, and I t</p> <p>22 I interviewed Captain Watkins. I never said I interviewed</p> <p>23 of this Q. Okay. Well, you talked with them.</p>

advancedONE.com

Page 98	Page 100
<p>1 A. That's the practice.</p> <p>2 Q. Does Vance County have an internal affairs</p> <p>3 department, or are you it?</p> <p>4 A. I conduct most of them, and then there have</p> <p>5 been occasions in where, depending on the size of the</p> <p>6 I've had to rely on other officers, other detectives</p> <p>7 that's appointed by the sheriff. Typically, it may be</p> <p>8 a detective and another officer.</p> <p>9 Q. What training do those officers have?</p> <p>10 A. I don't know what training -- I don't know</p> <p>11 what their training is.</p> <p>12 Q. I do want to talk about training a little</p> <p>13 bit.</p> <p>14 What training did you have to conduct</p> <p>15 use-of-force investigations?</p> <p>16 A. I've only -- you know, in terms of my</p> <p>17 training, my training was early on in my</p> <p>18 career when I first started doing these administrative</p> <p>19 investigations. The other training has been and that's -- for the most part, it's been early</p> <p>20 through -- going through, having done these over time.</p> <p>21 When I first started doing this internal affairs</p> <p>22 investigation, I was under the supervision of -- at the time, the captain at the time.</p> <p>23 the time, the captain at the time.</p> <p>24 Q. What time --</p> <p>25 A. My training came through -- and</p>	<p>1 it was after I had started helping the captain with</p> <p>2 internal affairs type of investigations.</p> <p>3 Q. And for the most part, you conducted these</p> <p>4 investigations as a single individual?</p> <p>5 A. For the most part, yes, ma'am.</p> <p>6 Q. Did you ever request help?</p> <p>7 I'm sorry?</p> <p>8 Q. Did you ever request help?</p> <p>9 A. Help has been had. You know, the -- in</p> <p>10 I don't know part of my -- doing these investigations,</p> <p>11 captain has had other officers helping some of the</p> <p>12 When you have an officer-involved shooting</p> <p>13 then I request help from the SBI.</p> <p>14 Q. Okay. And not within your department?</p> <p>15 A. I'm sorry?</p> <p>16 Q. Not within your department? You don't</p> <p>17 request help within your department?</p> <p>18 There have been a rare occasion. Again</p> <p>19 and that's -- for the most part, it's been early</p> <p>20 time. Did you -- can you recall a time in which</p> <p>21 you had, like, a panel of investigators?</p> <p>22 Yes. There was an officer who was a pa</p> <p>23 deputy working an area of the county in which his</p> <p>24 in-laws lived, and it was determined that he went</p> <p>25 to the in-laws' house, burglarized their</p>
Page 99	Page 101
<p>1 came through him as far as the on-the-job training</p> <p>2 Q. So you said when you "first started doing</p> <p>3 these."</p> <p>4 And "doing these," you mean use-of-force</p> <p>5 investigations?</p> <p>6 A. I mean internal affairs investigations.</p> <p>7 Q. Internal affairs, which would encompass</p> <p>8 of force?</p> <p>9 A. Some of them encompass use of force.</p> <p>10 Q. What year did you start that?</p> <p>11 A. 1997.</p> <p>12 Q. 1997? Okay. And you were trained by the</p> <p>13 captain --</p> <p>14 A. Yes.</p> <p>15 Q. -- at the time?</p> <p>16 Did you take any classes?</p> <p>17 A. I can only remember one time</p> <p>18 class in internal affairs investigation</p> <p>19 remember going any time but one time.</p> <p>20 Q. Okay. What time -- what -- do you</p> <p>21 what year?</p> <p>22 A. It would -- it would have been</p> <p>23 shortly thereafter in 1997, but I -- I</p> <p>24 it was in 1998 or -- you know, I don't</p> <p>25 I just don't -- I don't remember the exact</p>	<p>1 when the alarm -- or when the call was made</p> <p>2 back down there to do the investigation of</p> <p>3 that break-in, and it was determined that he was</p> <p>4 that actually did the break-in.</p> <p>5 More than one investigator worked that</p> <p>6 investigations.</p> <p>7 Q. Tell me about that. What do you mean more</p> <p>8 than one worked it? What did they do?</p> <p>9 A. I -- a minimum of three people, maybe four</p> <p>10 helped with that investigation. That officer was</p> <p>11 ended up being fired and criminally charged.</p> <p>12 That's, like, a common theme right now,</p> <p>13 right, in Vance County?</p> <p>14 MR. GEIS: Don't answer.</p> <p>15 MS. ROBINSON: Did you object, Chris?</p> <p>16 think I heard you say something.</p> <p>17 MS. ROBINSON:</p> <p>18 Q. You said more than one investigator</p> <p>19 worked -- let me just make a note, and this is --</p> <p>20 let's go off the record for this.</p> <p>21 (Discussion off the record.)</p> <p>22 Recess in proceedings from 2:57 to 3:01 p.m.</p> <p>23 MS. ROBINSON:</p> <p>24 Q. Mr. Bullock?</p> <p>25 Yes, ma'am.</p>

Page 102	Page 104	Page 105
<p>1 Q. Did you just have a conversation off the 2 record? 3 A. Yes. 4 Q. Was it about your questions, responses? 5 A. No, ma'am. 6 Q. What was it about? 7 A. It was about how long -- how much longer 8 it's going to take for us to finish this 9 Q. I got an answer for you. 10 A. Oh. 11 Q. I'm going to get you out of here. Okay? 12 I'm almost done. 13 A. Okay. 14 Q. I'm almost done. Okay. And we, really, 15 might be approaching done. Now, you know, I can hold 16 you for seven hours and question, question, 17 but I -- 18 A. It's totally okay. You have a right to know, 19 it. I'm okay with it. 20 Q. No. I asked you some about Mr. White 21 earlier, and I think you told me you didn't have very 22 much interaction with him, correct? 23 A. That's correct. 24 Q. And you didn't hear much about him, either? 25 A. No, ma'am, I didn't. He was</p>	<p>1 and it was before -- it was between 1997 and 2001. It was somewhere in that 2 range. 3 Q. But it was significant enough for you to 4 remember? 5 A. Yes, ma'am. Because I had an officer -- 6 That was very significant. 7 Q. Why was it significant? 8 A. I considered him a friend. 9 Q. Okay. Can you recall the number of citi- 10 zens who have complained to Vance County or filed 11 grievances or any of that nature? 12 A. No, ma'am. 13 Q. Would you say it's a lot, a little? 14 I don't -- again, I just don't have a - 15 anything to go on. I don't have anyth- 16 significant to go on with that for me -- for it t 17 a right to know, flare up in my memory. 18 There could have been complaints that w 19 directed to an officer's supervisor, and that wou 20 on. And someone would have looked into 21 that, and that supervisor would have handled that 22 know, outside my knowledge. So I -- and even wit 23 I -- did eventually come to my desk, I 24 from about the</p>	<p>19 -- I me 20 21 22 23 24 25</p>
<p>1 division from me, so he wasn't in my direct line of 2 command. So other than seeing him in the 3 passing through the office, it was just 4 would come -- he's walked by my office 5 he's poked in, and, you know, we spoke 6 again, it was so far and few between. 7 Q. Okay. We were talking about the 8 investigations that you completed at Vance County 9 And from what I understand, most of them were one 10 person. And you were telling me about the time in 11 which there was more than one investigation, and the number of times the county sheriff's departme 12 situation involved an incident in which an officer came in, like, threats of suit? Is that 13 behaved, you know, badly. 14 Did you seek assistance in that 15 investigation, or did -- was assistance provided to 16 you? 17 A. At the time I was captain -- 18 captain that was doing those investigations 19 particular case was assigned to me, and 20 decision as to what other officers would 21 Q. So that was around the 1997 when you were 22 telling me you had been trained? 23 A. Well, no. It was -- it might 24 200- -- I mean, a significant -- you know 25 have -- it wasn't early on. It was, you</p>	<p>1 direct line of 2 office, Q. Okay. Well, you just don't appear to m 3 like a person who would scare easily; is that tru 4 before, and A. I'm scared of snakes and dogs. 5 before. Q. Okay. But you can handle complaints wh 6 you're doing your job? 7 A. I can handle what? 8 Q. Complaints when you're doing your job. 9 A. Yes, ma'am. 10 Q. So you -- do you have a working knowled 11 the number of times the county sheriff's departme 12 an officer came in, like, threats of suit? Is that 13 A. I don't know what -- threats of soup? 14 Q. How many people -- how many citizens 15 threatened to sue the sheriff's office? 16 A. Oh, I have no idea. 17 Q. Has any citizen threatened to sue you i 18 didn't investigate? 19 A. No, ma'am. You know, I don't -- you kn 20 I've been sued before, but I don't know the numbe 21 who have threatened to sue the sheriff's 22 office. And I've never been threatened to, "If y 23 have done it something, I'm going to sue you." 24 it might I've never had that to happen. 25 know -- Q. Or sue the sheriff's office?</p>	<p>26 27 28 29 30 31 32 33 34 35</p>

Page 106	Page 108
<p>1 A. Or sue the sheriff's office.</p> <p>2 people -- you know, I -- you know, it is</p> <p>3 it's a -- it's a common thing for people</p> <p>4 I'm going to sue you." But I -- you know,</p> <p>5 for me, there's nothing that has an effect</p> <p>6 say, "Oh, my God. This person will sue</p> <p>7 do X, Y, Z." I don't -- I don't have a</p> <p>8 doesn't sway me one way or another. I've</p> <p>9 words "I'm going to sue you" a lot. You</p> <p>10 going to sue you-all" a lot. But you have</p> <p>11 sue, so --</p> <p>12 Q. So -- but you've been sued before?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. How many times?</p> <p>15 A. I would say four other times,</p> <p>16 other times.</p> <p>17 Q. Do you recall those instances?</p> <p>18 A. Oh, yes, ma'am. That's significant</p> <p>19 memory. So yes.</p> <p>20 Q. Can you explain them to me.</p> <p>21 A. Okay. There was a time that</p> <p>22 that I had -- I was driving north on the</p> <p>23 and then a highway patrolman was working</p> <p>24 had already occurred. And I stopped because</p> <p>25 was partially blocked by the ambulance</p>	<p>1 I mean, I got sued one time where a fight had</p> <p>2 happened at a club. An officer put a suspect in</p> <p>3 back of a car. The suspect kicked out the glass.</p> <p>4 officers tried to get the suspect out of the car.</p> <p>5 They started fighting with him, like, from the in</p> <p>6 side of the car. He was kicking officers, kicking</p> <p>7 officers.</p> <p>8 Another officer sprayed him with mace,</p> <p>9 and that was broke. We don't know if it was broke</p> <p>10 of him kicking the glass out or kicking</p> <p>11 officers or what, but that person sued me and all</p> <p>12 other officers there.</p> <p>13 And then I think two occasions I've been</p> <p>14 sued for people who were dead at the jail.</p> <p>15 Q. Okay. Thank you. Thank you for explain</p> <p>16 those situations.</p> <p>17 The only question I have is if you -- t</p> <p>18 extent you are able to share, what were the outco</p> <p>19 A. I guess the correct word -- I don't know</p> <p>20 don't know the legal term, but I considered it as</p> <p>21 was exonerated. I was exonerated on all of them.</p> <p>22 Q. Okay. So I want to -- I want to get --</p> <p>23 a want to make sure I understand this.</p> <p>24 There is no board review -- no standard</p> <p>25 board review on use-of-force incidents?</p>
Page 107	Page 109
<p>1 trooper's car and the -- one of the victims' cars.</p> <p>2 I stopped and backed up and put on -- put</p> <p>3 put on my traffic vest. And I start directing</p> <p>4 traffic, slowing traffic down, because the</p> <p>5 kind of a little bit over a slight decline.</p> <p>6 And I had been out there slowing traffic</p> <p>7 down for about 20 minutes or so, and then</p> <p>8 pulling a mobile home, like a transport</p> <p>9 a mobile home, came through at a very, very</p> <p>10 of speed and was not obeying my traffic</p> <p>11 for him to slow down. And then at the</p> <p>12 looked up, and he locked the brakes. The</p> <p>13 off and just wiped out the ambulance and</p> <p>14 And so that was one time.</p> <p>15 Q. What did he sue you for?</p> <p>16 A. I guess it was, like, failure</p> <p>17 my duty, causing that wreck. But that</p> <p>18 up -- it didn't get far.</p> <p>19 Another time I was working the</p> <p>20 room, and I was leaving to go to lunch.</p> <p>21 and a city officer had a person stopped</p> <p>22 stop. I drove up and said, "You-all go</p> <p>23 And they said "yeah." And I</p> <p>24 then that person sued me as a result of</p> <p>25 transpired in that traffic stop.</p>	<p>1 A. So There is no standard board review?</p> <p>2 Q. So there is no board that will convene</p> <p>3 saying, you know, this member must be a part of t</p> <p>4 board, that member; you get an amount of time to</p> <p>5 respond; there is --</p> <p>6 A. That wasn't a practice.</p> <p>7 Q. It wasn't a practice? Was it a practice</p> <p>8 a pulling was there a standard number of complaints th</p> <p>9 must be had before an officer is dismissed?</p> <p>10 my signals No, ma'am. Each thing is done, you know</p> <p>11 last minute incident. It wasn't, like, a buildup of anyt</p> <p>12 I'm going to stand up. My back is hurt</p> <p>13 I'm going to stand up and stretch. I can st</p> <p>14 here. I just need to stand up.</p> <p>15 Q. Mr. Bullock, if you want to take a</p> <p>16 ten-minute break --</p> <p>17 that ended No, no, no. I don't. I don't.</p> <p>18 Q. Okay. Okay.</p> <p>19 A. I just didn't want you to say, "What ar</p> <p>20 And to be honest I just needed to stretch.</p> <p>21 Q. Okay. That's fine.</p> <p>22 everything?" Is there a certain threshold that incre</p> <p>23 the likelihood to be dismissed from --</p> <p>24 that had A. I don't understand that question.</p> <p>25 Q. So is a severity of a deputy's actions,</p>



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

Page 110	Page 112
<p>1 increases his or her likelihood to be dismissed? A. I don't remember any.</p> <p>2 A. We work at the pleasure of the sheriff. Q. I</p> <p>3 can't answer that question. 3 enforce the law, would you say?</p> <p>4 Q. Well, for your recommendation. 4 A. I don't know if I can put a quantitative</p> <p>5 A. My recommendation is done on a case-by-case basis how much discretion an officer has. An</p> <p>6 basis. 6 officer has some discretion. An officer is not</p> <p>7 Q. Do you find that different sheriffs have 7 different thresholds? 8 discretion.</p> <p>8 different thresholds? 8 discretion.</p> <p>9 A. I don't know how to apply that question. Q. Are there instances in which an officer</p> <p>10 It's apples to oranges, in a way. By working at the 10 no discretion to enforce the law?</p> <p>11 pleasure of sheriff, I can't apply that 11 A. Yes, ma'am. I believe there are instan</p> <p>12 Q. Now I'm asking you, would soliciting sexual 12 favors from citizens be a serious complaint? Q. What are those instances?</p> <p>13 favors from citizens be a serious complaint? 13 A. I think that it would. 14 A. If a person murdered someone in front o</p> <p>14 A. I think that it would. 14 A. If a person murdered someone in front o</p> <p>15 Q. And just so I can understand it, is it this 15 is it this I think the officer doesn't have any</p> <p>16 is you. 16 discretion to enforce the law. I think he would</p> <p>17 Is assault a serious infraction? 17 to enforce the law.</p> <p>18 A. Assaults can mean -- have a range, so it 18 Q. So if a sheriff's officer shot a citize</p> <p>19 depends on the range of the assault. 19 they should be placed under arrest immediately?</p> <p>20 Q. Is it a requirement that supervisors 20 be involved?</p> <p>21 instances in which deputies are involved in domestic 21 in domestic No, ma'am. It depends on the circumsta</p> <p>22 violence? 22 In the first incident, I said "murder." If a</p> <p>23 A. I don't know when you say supervisors 23 supervisors' officer shot somebody and it wasn't mur</p> <p>24 it a requirement for supervisors to report 24 then, no, they shouldn't be arrested. If they sh</p> <p>25 if a -- if a deputy is called to a house 25 where the self-defense, then they shouldn't be arre</p>	<p>1 increases his or her likelihood to be dismissed? A. I don't remember any.</p> <p>2 A. We work at the pleasure of the sheriff. Q. I</p> <p>3 can't answer that question. 3 enforce the law, would you say?</p> <p>4 Q. Well, for your recommendation. 4 A. I don't know if I can put a quantitative</p> <p>5 A. My recommendation is done on a case-by-case basis how much discretion an officer has. An</p> <p>6 basis. 6 officer has some discretion. An officer is not</p> <p>7 Q. Do you find that different sheriffs have 7 different thresholds? 8 discretion.</p> <p>8 different thresholds? 8 discretion.</p> <p>9 A. I don't know how to apply that question. Q. Are there instances in which an officer</p> <p>10 It's apples to oranges, in a way. By working at the 10 no discretion to enforce the law?</p> <p>11 pleasure of sheriff, I can't apply that 11 A. Yes, ma'am. I believe there are instan</p> <p>12 Q. Now I'm asking you, would soliciting sexual 12 favors from citizens be a serious complaint? Q. What are those instances?</p> <p>13 favors from citizens be a serious complaint? 13 A. I think that it would. 14 A. If a person murdered someone in front o</p> <p>14 A. I think that it would. 14 A. If a person murdered someone in front o</p> <p>15 Q. And just so I can understand it, is it this 15 is it this I think the officer doesn't have any</p> <p>16 is you. 16 discretion to enforce the law. I think he would</p> <p>17 Is assault a serious infraction? 17 to enforce the law.</p> <p>18 A. Assaults can mean -- have a range, so it 18 Q. So if a sheriff's officer shot a citize</p> <p>19 depends on the range of the assault. 19 they should be placed under arrest immediately?</p> <p>20 Q. Is it a requirement that supervisors 20 be involved?</p> <p>21 instances in which deputies are involved in domestic 21 in domestic No, ma'am. It depends on the circumsta</p> <p>22 violence? 22 In the first incident, I said "murder." If a</p> <p>23 A. I don't know when you say supervisors 23 supervisors' officer shot somebody and it wasn't mur</p> <p>24 it a requirement for supervisors to report 24 then, no, they shouldn't be arrested. If they sh</p> <p>25 if a -- if a deputy is called to a house 25 where the self-defense, then they shouldn't be arre</p>
Page 111	Page 113
<p>1 deputy is involved in domestic violence, then it should 1 if a sheriff's officer murdered somebody in front</p> <p>2 have been an incident report generated from that officer, then I think the arresting offic</p> <p>3 Q. There should have been an incident? 3 doesn't have any discretion.</p> <p>4 A. Uh-huh. If it's a substantiated report. Q. a So self-defense plays a role in</p> <p>5 substantiatable (sic) report. 5 the scenario?</p> <p>6 Q. Were you made aware of any instances in A. Yes, ma'am. And in that scenario, yes,</p> <p>7 which deputies were involved in domestic violence? 7</p> <p>8 A. Yes. 8 MS. ROBINSON: I think we can take a</p> <p>9 Q. Tell me about those instances or that 9 five-minute break. I want to just review so</p> <p>10 incident. 10 things and then see if -- you know, can we g</p> <p>11 A. I don't -- there's an officer that had gone 11 that had gone</p> <p>12 out of town, for some reason, with another officer. 12 recess in proceedings from 3:26 to 3:33 p.m.</p> <p>13 And when he got back into town, he discovered by 13 MS. ROBINSON:</p> <p>14 wife was with another gentleman at the 14 Cracker Barrel. Q. Mr. Bullock, I have, like, a couple</p> <p>15 And because of the way he conducted himself, follow-up questions, and this is just for my own</p> <p>16 service was no longer needed. His conduct was 16 clarification. We talked about the canine incide</p> <p>17 his wife. 17 and the -- a report shows that it was Adam Hight,</p> <p>18 Q. Is that the only one you can think of? 18 said the canine bit a woman.</p> <p>19 A. That's the only one that's coming to mind 19 And that was the woman who was in the</p> <p>20 right now, and I'm not saying that's the 20 warehouse, correct?</p> <p>21 That's what's coming to mind right now. 21 A. Yes, ma'am.</p> <p>22 Q. Did you make that recommendation? 22 Q. A civilian?</p> <p>23 A. Yes, ma'am. 23 A. Yes, ma'am.</p> <p>24 Q. Were there any criminal charges 24 brought Q. Okay. It wasn't Adam Hight.</p> <p>25 against that individual? 25 You also mentioned the domestic -- we t</p>	<p>1 deputy is involved in domestic violence, then it should 1 if a sheriff's officer murdered somebody in front</p> <p>2 have been an incident report generated from that officer, then I think the arresting offic</p> <p>3 Q. There should have been an incident? 3 doesn't have any discretion.</p> <p>4 A. Uh-huh. If it's a substantiated report. Q. a So self-defense plays a role in</p> <p>5 substantiatable (sic) report. 5 the scenario?</p> <p>6 Q. Were you made aware of any instances in A. Yes, ma'am. And in that scenario, yes,</p> <p>7 which deputies were involved in domestic violence? 7</p> <p>8 A. Yes. 8 MS. ROBINSON: I think we can take a</p> <p>9 Q. Tell me about those instances or that 9 five-minute break. I want to just review so</p> <p>10 incident. 10 things and then see if -- you know, can we g</p> <p>11 A. I don't -- there's an officer that had gone 11 that had gone</p> <p>12 out of town, for some reason, with another officer. 12 recess in proceedings from 3:26 to 3:33 p.m.</p> <p>13 And when he got back into town, he discovered by 13 MS. ROBINSON:</p> <p>14 wife was with another gentleman at the 14 Cracker Barrel. Q. Mr. Bullock, I have, like, a couple</p> <p>15 And because of the way he conducted himself, follow-up questions, and this is just for my own</p> <p>16 service was no longer needed. His conduct was 16 clarification. We talked about the canine incide</p> <p>17 his wife. 17 and the -- a report shows that it was Adam Hight,</p> <p>18 Q. Is that the only one you can think of? 18 said the canine bit a woman.</p> <p>19 A. That's the only one that's coming to mind 19 And that was the woman who was in the</p> <p>20 right now, and I'm not saying that's the 20 warehouse, correct?</p> <p>21 That's what's coming to mind right now. 21 A. Yes, ma'am.</p> <p>22 Q. Did you make that recommendation? 22 Q. A civilian?</p> <p>23 A. Yes, ma'am. 23 A. Yes, ma'am.</p> <p>24 Q. Were there any criminal charges 24 brought Q. Okay. It wasn't Adam Hight.</p> <p>25 against that individual? 25 You also mentioned the domestic -- we t</p>

 **AdvancedONE**
LEGAL

Case 5:19-cv-00467-BO Document 70-1 Filed 04/01/21 Page 125 of 665

Exhibits	11:01 21:19	2:06 76:5	
Exhibit 1 3:7 20:25 21:2	11:50 47:25	2:57 101:22	9
Exhibit 2 3:8 20:22	11:55 47:25	3	9 90:23,24
Exhibit 3 3:9 46:2, 11 71:2	12 84:25	3 46:2,11,12 50:2,4, 9 71:1,2	911 38:24 43:15 48:24 49:22,23
Exhibit 4 3:10 48:13,14 68:15 92:15	12:53 76:5	30 21:8	A
Exhibit 5 3:11 66:18,19 71:9	15 72:25 73:1	31 33:24	a.m. 21:19 47:25
Exhibit 6 3:12 84:2, 3	1801-3870 50:24	36 66:24 67:11	able 108:18
Exhibit 7 3:13 86:13,14	19- 104:1	37 66:21,24	about 5:16 6:8 7:10 11:19 13:14 16:24 18:8 19:10 21:17, 21 24:5,7,8,12,13, 20 30:22 31:12 33:18 35:10 36:14 37:5 40:12 41:13, 20 43:4,11 46:9 47:13 50:3 53:5,16 54:2 55:11 56:14, 16 57:13 58:2 59:7 60:4,25 62:3,4,15, 25 64:21 66:8 69:18 72:3 74:1 77:7,13,20 82:13, 17 83:2,3,7,9,22 86:19 91:3 93:14 96:18 98:12 101:7 102:4,6,7,20,24 103:7,10 107:7 111:9 113:16
Exhibit 8 3:15 89:2, 7,12	1967 5:9	3:01 101:22	above 50:12
Exhibit 9 3:16 90:23,24	1992 6:16 8:4	3:26 113:12	absence 14:8
\$	1997 6:22 8:6,8 32:13,20,24,25 33:16 94:14 99:11, 12,23 103:21 104:2	3:33 113:12	abuse 8:13 10:6
\$20 10:21	1998 99:24	4	accelerated 97:3
0	2	4 48:13,14 68:15 85:1 92:15	accidentally 67:18, 20
06 36:4,5	2 20:22 21:4 50:1,4, 9	5	according 12:11 65:9,13
1	20 107:7	5 66:18,19 71:9 72:25 73:1	
1 20:25 21:2,4 22:4 44:7 45:25 89:22 91:25	20-something 65:25	6	
1029 5:11	20/20 76:11,15 77:7,9	6 84:2,3	
10:35 21:19	200- 103:24	6th 91:3	
10B-25 4:2	2001 104:2	7	
	2004 8:22	7 86:13,14	
	2005 8:17,22	7-15-2009 45:20	
	2018 36:5 91:4 94:14	8	
	2019 65:24	8 89:2,7,12	
	23-page 22:9		
	28th 5:9		

accurate 89:14	70:25 80:6 89:20	always 5:12 26:23	21 14:3,4,6,10,12,
acted 97:19	100:18 103:6	56:6 59:8,12	17,22 15:4,9,14,25
acting 8:17	104:15	am 70:11	16:1,2,5,8,10,13,14
actions 48:9	against 48:10	ambulance 106:25	17:5,7,8,19 18:15,
109:25	111:25	107:13	18,22,25 19:9,17
actual 46:22 59:4	agency 85:13	amount 10:19	20:1,5,9 21:4,5,8,
90:5	agents 45:25 46:17	25:13 32:20 109:4	13,14,22,23 22:8,
actually 9:4 17:16	ago 21:8	ample 79:17	12,20,23 23:1,5,7,
55:4 60:12 65:18	ahead 27:13,14	an 6:13,21 8:16 9:1,	24 24:2,4,23 25:6,
76:3 89:9 90:2	28:6 31:9	19 10:18,22,23	9,12,14,19,20
101:4	aids 85:5,14	11:5 12:2,8,9 14:21	26:16,18,22,23
Adam 113:17,24	alarm 101:1	15:24 17:2,3 18:12	27:6,16,21,24 28:9,
add 35:18	alive 95:19	25:13,20,21 28:10,	12,13,20 29:11,15,
address 5:10	all 7:3 8:12,24	11,19 33:10,11	24 30:17,25 31:9,
admin 15:24	12:19 13:13 17:7	34:12 36:7 38:9,15	16,20,22 32:1,6
administration	21:12 24:2 25:14	39:4,8,9,10,11,12,	33:4,5,6,7,12
6:12 8:21 37:9	26:18,22 27:5,10	13,19,25 40:19,20	34:17,18,21 35:4
40:19	28:18 35:14 36:16	41:9,23,24 42:2	36:5,19,23 37:3,5,
administrative 9:1,	40:2,21 46:21 50:8,	44:7,8 46:1,23 48:2	10 38:2,9,13,22,25
4,5 26:15 37:11,12	11 54:25 56:15	53:10,23 54:13	39:1,2,3,18,23,24
40:20 41:23,24	59:7 61:21 63:4,23	60:6,9,16 64:19	40:6,7,17,18 41:1,
42:2 48:8 94:15	64:7 75:17 77:3,15	65:3 67:24,25 68:7,	7,9,11,14,15,16,17,
98:18	78:15 80:10 83:5,	8,11 70:2,6,8 73:7	20,22 42:1,5,9,15,
adverse 70:6,9	21 85:11 88:1	76:9 77:24 79:1	22,25 43:19,23
affairs 97:20 98:2,	93:15 97:15	80:25 82:1,2 83:18	44:1 45:10,18,21
21 99:6,7,18	108:11,21	85:15 89:14 92:5,9	46:19,22 47:3,7,8,
afford 46:23	allow 34:12	94:14 95:25 97:17	19 48:5 50:2,4,9,
after 6:2,10 15:14	allowed 73:16,17	98:2 100:12,22,23	13,24 51:7,15 52:3,
19:21 24:2,21	allows 69:10	102:9 103:12	4,5,9,11,25 53:6,
25:25 26:8 27:9	almost 15:1	104:6,20 106:5	17,20,21 54:11,19,
28:13 29:12 33:11	102:12,14	108:2 109:4,9	23,24 55:4,19,21
43:21 49:7,11 57:9	along 13:7	111:2,3,11 112:2,5,	56:15,23 57:5,6,7,
61:24 85:6 100:1	already 71:11	6,7,9,12	8,17,18,23 58:12,
afterwards 26:5	106:24	and 4:3,10,17,19	18,20,24 59:1,4,21,
again 16:12 25:22	also 4:10 16:22	5:8,21,25 6:6,13,	23 60:13 61:7,18,
27:12 28:9 43:14	20:13 32:25 64:14	14,15,22,25 7:8,11,	25 63:1,6,14,19,20,
56:5 63:12 64:15	80:1 97:16 113:25	18,20,23 8:1,4,5,7,	21,22 64:6,11,13,
		10,12,14,20,21,24	24 65:3,7,9,11,14,
		9:15,17,19,20	16,19,25 66:3,13,
		10:20,25 11:5,6,17,	14,24,25 67:17
		23 12:4,7,13,14,18,	68:15 69:1,9,13
		20,24 13:17,19,20,	70:15,17 71:8,23
			72:7,15,16,25 73:1,
			7,17,25 74:3,8,11,
			17,18,19 75:5,7,13,

19 76:9,13,16 77:16 78:7,9,10,16, 18,21,23 79:17,18, 19,24 80:18 81:2 82:4,5,17 83:16 84:1,8,16 85:15,24 86:12,23,24 88:10, 15,23 89:2,14,17, 22 90:6,7 91:1,4,6, 10,21 92:24 93:7, 13,22 94:24 95:1,2, 4,12,14,19,24 96:2, 10,11,14,15,16,17, 23,24,25 97:3,4,6, 16 98:4,8,25 99:4, 12,18 100:3,14,19, 24 101:1,3,11,19 102:8,14,16,21,24 103:4,5,6,9,10,11, 19 104:2,20,21,22, 23 105:4,22 106:23,24,25 107:1,2,3,6,7,10, 11,12,13,14,20,21, 22,23 108:8,11,13 109:13 110:15 111:13,15,20 112:20,23 113:6, 10,15,17,19 animal 78:20 94:25 animals 46:25 47:9 78:19 another 12:20 19:9 28:13 42:5 77:12 91:24 95:7,14 96:13 98:8 102:25 106:8 107:19 108:8 110:25 111:12,14 113:2 answer 4:16 7:24 11:9 37:25 39:20, 22 65:18 84:22 101:14 102:9 110:3	answered 72:2 answers 78:16 any 4:21 6:2 24:11 35:9,21 36:14 39:4 42:17 43:5,9,14,17 44:9,10 46:6,24 52:15 60:2 67:18 68:10 69:20,22 70:8,10,23 74:12, 25 75:1 79:22 80:9, 12,16 83:16 87:10, 12 88:7,21,23 92:8 93:13 94:1 97:15, 22,24 99:16,19 104:12 105:17 111:6,24 112:1,15 113:3 anybody 27:23 60:19 69:11 70:11, 21,23 anybody's 75:23 anyhow 31:10 anyone 61:14 anyplace 20:3 anything 5:2 11:19 35:16,17 41:2 57:9 58:2 67:22 69:10 75:5 82:19 83:2,3,7 104:16 109:11 AOC 23:2 33:24 apart 69:5 appear 105:2 appears 92:1 apples 110:10 applicant 12:7,8,9 25:5 28:6 30:22 34:12 applicants 18:14	application 12:2,5 17:3,11,14,19 18:15 19:22 21:2 24:5 33:10,11 46:23 applications 32:20 apply 110:9,11 appointed 98:7 apprehend 80:3 88:12 apprehended 92:10 approaches 74:19 approaching 102:15 approved 85:15 approximately 84:24 April 65:24 are 5:1 12:11 13:15 14:5,17 19:15 23:2 25:10 29:3 37:10 39:4,7,17,18,21 41:4,20 44:5,23 50:7,14,25 51:2 56:1,7 61:7,25 63:6,8,10 64:22 65:13 67:4 69:20 71:24 72:17 76:10, 25 78:23 82:21,23 84:13,24 86:12,17 87:16,21 89:17 90:7 93:8 94:1,22 98:3 108:18 109:19 110:21 112:9,11,13 area 80:25 96:23,24 100:23 aren't 25:2	arm 58:20 59:2,24 60:6,9,12,13,16,18 67:15 69:4 75:21 arms 74:18 arose 81:11 around 14:11 53:3 58:1 103:21 arrangements 62:13 arrest 72:1,11 74:2, 7,20 91:16 92:5 112:19 arrested 74:16,17, 18 112:24,25 arresting 85:13 113:2 arrests 71:20 as 4:4,9,18,19 6:9, 13,23 7:2,20 8:24 9:5,19 10:18 12:10 13:25 14:10,22 16:8,18,19,21 18:12 21:2 22:10 27:6 32:17 33:1 34:21 36:22,23 38:3 41:17 47:1,3 48:13 54:10 56:5, 21 57:6,20,22 63:17 65:10,15 66:17 68:3,14 69:16 73:23 78:11 85:5 86:13 89:2,12 91:5 92:12,15 93:5 94:23 97:1,17,19 99:1 100:4 103:20 107:24 108:9,20 Aside 36:11 ask 18:8 19:10 23:24 28:7 50:2 57:18,19 68:5
---	--	--	---

69:18 72:9 asked 21:22 37:5 53:19 60:25 71:21 86:19 102:20 asking 21:21 77:7 89:25 110:12 asks 4:16 aspect 37:3 assault 110:17,19 assaulted 92:22 Assaults 110:18 assigned 7:23 38:11,23 78:21 88:16,22 103:19 assignment 25:18 assistance 103:14, 15 assisting 94:25 associated 69:20, 23 asthma 70:18,21 at 6:6,7,16 7:3,16, 20 8:4,5 11:2,14,17 13:1,13 15:1 17:13, 20,21 21:8 24:23 25:2,23 26:1,20 27:5,15 28:12,17 34:3 35:8,24 36:2 37:4,19 38:4 39:3 40:2,16 45:1,7,13 49:23,24 52:16,22 53:10,14 54:17,25 55:1,2 61:21 62:6 65:18,20 66:24 68:1,25 70:13 75:3, 5,7 76:7,8 77:3,8 80:10,25 81:22 83:21 86:22 88:1 94:23 96:6 97:3	98:22,23 99:15 103:8,17 107:9,11 108:2,14 110:2,10 111:14 attack 74:5 attacked 80:15 attacks 70:16 attempting 92:7 attorney 62:14 audio 90:3 authority 76:15 available 25:2 average 42:18 aware 54:11 56:8 70:11 111:6 away 56:24 <hr/> B <hr/> B.9. 45:17 B.9l. 58:23 bachelor's 6:3 back 6:13 10:7 19:20 26:19,20,21, 22 27:13,14 28:13 32:2,5,6 33:6,11 47:11 50:2 51:22 53:6,12 65:3 68:14 70:5 71:5 74:18 76:22 78:8,9 82:20 91:7 92:14 93:15, 16 94:1,6,12 101:2 108:3 109:12 111:13 backed 107:2 background 12:6,7 17:6,17 19:23	20:14,16 21:22 23:4 24:21 26:4,6,8 28:21 33:23 34:8, 11,13,14 37:16 backgrounds 26:13 badly 103:13 bar 60:6,9,16,18 67:15 75:21 Barrel 111:14 Bartholomew 91:4 base 51:6 58:21 based 44:16,18 50:5,15 51:10,12, 14 61:5 84:22 85:24 basic 7:7,8 14:1 27:3 basically 53:2 60:11 basis 35:13,14,17 110:6 batons 65:11,15 be 4:11 13:21,25 14:20,25 16:16 17:22 18:16 24:18, 20 25:4,17,18 27:11 28:10,14 29:6,13 30:7,8,10, 14,18,19,23 32:11, 23 33:13 34:14 35:22 38:18,19,20, 25 39:5 41:7,12,16 42:4,5,10,22,24,25 44:1,3,4,20 46:3,5, 8 47:1 48:12 50:1 52:16 58:4 60:1 63:25 64:8,11,14, 16,22 65:1,3,5,6,8 67:9,17 68:4,25	70:18,19,20 73:5 75:22 76:13 77:24 78:12 79:7,13 83:15,19 84:2 85:6, 7,10,12,14,19,21 92:1,3 97:15 98:7 102:15 109:3,9,23 110:1,13 112:19, 24,25 bearing 77:10 became 36:4 53:5 because 15:1 17:16 24:25 25:6,23 27:1, 12 28:14 32:22 33:2 35:4,11 36:21 38:5 44:25 51:20 57:2 62:5 64:6,23 69:1,7 75:23 82:18, 21 97:15,18 104:6 106:24 107:4 111:15 become 83:6 been 4:3,12 7:17 10:1,12 12:25 13:1, 2,6,9 14:11,14,21 15:11 17:12 19:7 20:8,13 24:23 28:9, 16 31:15 32:12,14, 15 33:15,23 34:3 35:24 36:2,24 40:6 44:8 47:8 52:16,18, 20,21 54:5 61:8,9, 10 63:2,4 70:9,22 72:18,23 74:6,9 79:1 81:8,9,21,25 82:1 83:17 88:22 89:12 93:7,13 96:3, 6 98:5,19 99:22 100:9,18,19 103:22,23 104:19 105:1,20,22 106:12 107:6 108:13 111:2,3
---	--	--	--

<p>before 4:12 11:14 17:2,15 26:3,6 28:12 33:3 38:6 44:8,9,16,19 49:17 53:3 59:4 62:8,9 70:3 84:23 90:15 94:9 97:12 103:4,5 104:1 105:20 106:12 109:9</p> <p>beginning 34:25</p> <p>behaved 103:13</p> <p>behind 65:2 74:18</p> <p>being 27:6 34:13 36:5 55:5 62:12 75:24 86:20 101:11</p> <p>believe 9:2 13:4 18:16 77:18 112:11</p> <p>believed 68:25</p> <p>believes 92:3,6</p> <p>bent 60:8 67:14</p> <p>Bertie 23:18</p> <p>better 106:6</p> <p>between 52:2 72:25 103:6 104:1,2</p> <p>big 40:4</p> <p>birthdate 5:8</p> <p>bit 11:16 19:4 39:13 42:20 69:6 75:22 76:10 80:24 81:2 85:19,22 86:20,24, 25 98:13 107:5 113:18</p> <p>bite 80:22</p> <p>bitten 79:8,9,20,23 80:17 82:4</p> <p>BLET 13:19,21 14:11 66:8,9,12</p>	<p>71:8,22,25 72:3,7, 11,14 75:12</p> <p>BLET's 71:19</p> <p>blocked 106:25</p> <p>board 108:24,25 109:1,2,4</p> <p>bone 69:4</p> <p>both 54:17</p> <p>bottom 45:7,12 46:13</p> <p>brakes 107:12</p> <p>Brame 11:22</p> <p>brandished 64:4</p> <p>brandishing 59:4</p> <p>break 21:14,16,17 67:1 76:3 109:16 113:9</p> <p>break-in 39:9 101:3,4</p> <p>break-ins 10:5</p> <p>brief 5:14</p> <p>briefly 6:4,13</p> <p>bring 86:3</p> <p>broke 50:8 58:20 59:1,24 100:25 108:9</p> <p>brought 79:13 111:24</p> <p>building 80:24</p> <p>buildup 109:11</p> <p>bulk 14:6</p> <p>bull 35:4</p> <p>bullet 46:19 85:4</p> <p>Bullock 4:2,7,23,24</p>	<p>5:7 18:6 21:21 22:12 37:18 45:14 48:2 61:19,23 76:7 87:21 89:11 90:10 101:24 109:15 113:14</p> <p>Bullock's 87:18 89:4</p> <p>Bullocks 4:25</p> <p>burglarized 100:25</p> <p>bust 83:23</p> <p>but 4:8 6:5 8:13,18, 19 10:23 11:13 12:19,22 13:2,9 14:1,14 15:2,4 16:17,21 17:15 23:25 25:22 26:13, 22 27:8,22,25 30:5 32:7 33:7,22 34:2, 19,24 35:7 37:5 41:2 42:22 47:13 49:9,23 50:3 51:10, 16 52:15,18 54:11, 18 55:24 56:8,13 57:4 61:22 62:4 64:4,10 66:5 68:25 70:14 71:18 74:21 76:15,23 77:11 79:24 80:23 81:12 82:4,5,17 83:3,20 84:15,18 88:2,9 89:20 95:21 96:22 99:19,23,25 102:17 103:5 104:4 105:5, 20 106:4,10,12 107:17 108:11,20</p> <p>by 4:6 6:11 18:19 19:5,13 21:20 22:2, 7 30:11 35:4 36:25 37:24 38:10,13 39:13 42:24,25 43:8 45:4 46:15</p>	<p>47:1,18 48:1,15 55:14 60:11 64:14 66:20 67:6 71:10 73:15 74:4,17 76:6, 21 78:5 80:24 82:7 84:4,12 85:8,10,15 86:8,16 87:20 88:15,16,22 89:8 90:8,9,20,25 91:9 92:7,8 98:7 99:12 101:17,23 103:4 106:25 110:10 113:13</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>calculated 94:14</p> <p>call 34:16 41:17 54:13 59:9 87:24 101:1</p> <p>called 15:4 38:19, 21 53:10 61:25 79:17 97:23 110:25</p> <p>calls 7:24 14:6 63:18</p> <p>came 6:13 8:19,20 17:1 28:13 33:11, 14 53:12 61:24 81:4,11 93:14 95:1 96:10 97:2 98:25 99:1 107:9,12</p> <p>can 5:10,19 6:8 7:22 10:16 13:11 16:25 17:21,24,25 18:3,4,5,11,17,23, 25 19:14 20:21 21:25 22:3,5,11,15, 17 23:1,9 24:19 25:14 26:10,11 29:9 30:22 31:12 34:7 36:7 37:21,25 38:20,22 39:22</p>
--	--	---	---

42:24,25 43:4 45:2, 7,10 47:6,16,19 48:5,19 53:1 55:11, 16,17,19 57:14,15 58:9,18 60:9 63:15 66:21,22 67:1,7,17, 24 68:7 72:22 73:1 74:1,15 76:3,4,12, 16 78:3 79:4 80:13 83:4 85:1 86:1 89:1 90:14,17,18 91:6, 17 94:9,22 99:17 100:20 102:15 104:10 105:5,7 106:20 109:13 110:15,18 111:18 112:4 113:8,10 can't 11:9 26:11,12 27:18 36:14 42:14 45:15 47:8 55:24 63:13 65:18 66:2 68:3 70:14 74:16 79:22 90:18 91:17 110:3,11 candidate 13:23 14:11 canine 77:23,24 78:7,20 79:2,7,13, 19,21 80:15,17 81:9,13 82:2 83:2, 5,6,10,13,18,19,25 85:11,19,22,24 86:4 113:16,18 canines 77:21,22 79:15,25 80:1,4,7 82:4,21 83:2,23 84:5 85:17 cannot 32:21 Capsicum 46:20 captain 12:20,25 13:2,16 15:24 16:18,19 49:14,21	55:15 58:11 75:5, 18 93:23 98:23 99:13 100:1,11 103:17,18 captains 16:2 car 39:24 53:2 74:10,11 95:7 96:12 107:1 108:3, 4,6 card 27:1 career 6:8 8:7 98:18 Carolina 5:11,13, 18,24 6:7 20:9,11 23:11,16,17,18,19, 20,21 carry 47:6 cars 25:2 107:1,13 case 25:17 26:9 43:10 70:19 85:8, 10 103:19 case-by-case 110:5 cases 8:12 10:2,3,6 64:17 79:21 85:7, 12 caught 25:10 26:20 caused 69:3,8 73:4 causing 107:17 Central 5:24 6:7 certain 27:25 64:17 66:14 79:12 109:22 certainly 59:23 certificate 27:4 certifications 25:7 certified 88:2	chance 45:24 46:16 89:11 change 11:16 35:1 charge 9:16 37:9, 16 83:13,17,19,21 charged 101:11 charges 24:12 96:7 111:24 chase 39:11 95:8 96:11,15,18,21,22 check 12:6,7 17:6, 17 19:23 20:14,16 21:14 24:21 34:8, 11,13 53:14 checked 54:10 56:7 chemical 45:24 46:16 71:12 74:13 chief 16:1,2,3,4,7,8, 21 child 8:13 10:5 chin 75:22,24 Chowan 23:18 Chris 22:5 47:21 89:1 101:15 circumstances 12:11 27:25 42:12 112:21 citizen 67:21 70:6,8 79:2 95:16 105:17 112:18 citizens 104:10 105:14 110:13 city 107:21 civil 6:24,25 9:3 15:7,8,10 37:15 82:9,18	civilian 87:1 113:22 clarification 113:16 clarify 78:10 class 89:22 99:18 classes 99:16 classroom 91:13 clavicle 73:6,11,15 clearly 78:11 clerk 20:3,5 34:17 clerks 23:3 26:20 close 67:16 club 108:2 coffee 47:23 colleague 4:10 collected 9:14 college 5:21,23 6:10 18:25 come 10:7 12:9 17:4 25:14 26:5,13, 14,15,16 38:2,5 39:2 40:14,25 41:3, 19 42:7 47:10 50:2 58:24 74:11 81:10 82:17 93:16 97:16 103:4 104:24 come-along 60:8 comes 25:5 70:11 comfortable 84:21 coming 9:8 24:17 33:4 35:11 67:22 94:1,6,11,22 96:14 111:19,21 command 15:15 103:2 commander 15:23,
--	--	---	--

24 81:20,21 committed 42:17 96:1,5 common 74:21 101:12 106:3 compare 68:3 compiled 27:6 51:14 compiling 26:23 complain 73:22 complained 104:11 complaint 49:1,3,5, 12 92:16 110:13 complaints 104:19 105:5,8 109:8 complete 6:5 12:13 56:21 completed 7:8 56:22,23 57:17 70:2 103:8 completion 43:6 computer 27:16 concealed 37:14 concept 76:11,22, 25 77:7 concerning 42:3 conclude 60:22 conclusion 50:10 51:10 52:4 58:19, 24 60:21 68:20 conclusions 50:12 concrete 28:23 conduct 92:8 98:4, 14 111:16 conducted 19:22	48:25 61:1 81:12 100:3 111:15 conducting 48:20 confronted 53:4 confuse 4:24 confusion 4:20 conjunction 77:21 consequences 44:13 consider 14:23 68:2,4 considered 81:9 82:22,23,24 83:1 104:9 108:20 consist 42:1 contact 40:16 41:12 53:9,11 contained 48:7 continue 17:25 continued 9:7 52:11 continuum 44:6 63:11,17,19,24 64:22 65:9,14,17, 19 71:16 72:1,12 contract 19:15,20 contrary 69:3,7,13, 17 control 11:3 59:25 60:1,5 67:16 71:19 72:1,11 73:14 75:25 78:18,22,23 95:1 controlled 85:5,9, 11,16,23 convene 43:10,13	109:2 convened 27:9 30:17 convening 30:20 conversation 41:13 51:8,11,25 52:1,8 53:21,24 56:12,14, 17,20,25 62:17,21 102:1 conversations 50:3 51:5,19,23 93:16 94:1 convicted 93:7,13 96:3,6 conviction 92:12 conviction] 93:6 convictions 96:4 cooperative 53:14 copy 26:25 corner 45:14,15 correct 23:22 29:19 30:12,20 31:8 44:22,24 50:16 58:4,6 59:5,6 61:2 65:11 70:18 71:13 75:8 82:22 87:22 88:15 89:15,23 92:19,22,25 93:19 102:22,23 108:19 113:20 could 27:23 32:19 35:18 38:19,25 39:14 44:3,4,20 46:12 59:21,24,25 60:6,7 65:6,8 68:22,23 69:18 70:18 76:23 79:7 92:25 104:19,25	couldn't 32:13 53:20 counties 24:3 county 6:14,16 7:8 8:5 10:13 11:2,14, 18 13:12 23:7,9,10, 11,12,13,16,17,18, 19,20,21,22 25:1 35:2 45:8,9 58:14 66:7,11 71:18,21, 24 72:3,7,10,14 75:7,10 76:15 78:6 82:10 85:10,16 87:13 88:17,19,22, 25 89:18 96:2 98:2 100:23 101:13 103:8 104:11 105:11 County's 45:22 couple 113:14 court 8:1 9:22 10:2 33:20,21,22 37:17 76:15 85:7 courthouse 25:12 courts 20:3,6 23:3 26:15 85:6 Cracker 111:14 created 33:3 criminal 6:1 8:2,11, 12 9:6 10:2,3 12:6 14:20 17:6 19:23 20:2,5,10,14 23:4 24:3,11 34:8,11 37:15 111:24 criminally 101:11 criteria 79:6 cuff 60:14 current 11:17,19
---	--	--	---

<p>custody 79:6,8 92:6,12 93:5</p> <p>customary 88:18</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>danger 69:22</p> <p>dangers 69:20</p> <p>data 43:15,16</p> <p>date 8:23 45:18 49:7 52:5</p> <p>dates 8:19</p> <p>day 37:19,22 49:6 52:4 53:3,13,23</p> <p>day-to-day 35:13, 14,17</p> <p>days 40:15</p> <p>DCI 20:1 26:16 37:14</p> <p>dead 95:19 108:14</p> <p>deadly 63:22,25 64:2,24 91:10,24 92:4,7,25 93:11 94:16,19 95:9 96:13</p> <p>death 92:9</p> <p>debris 40:4</p> <p>decision 16:16 17:8 50:5,15 58:21 77:10,11 103:20</p> <p>decisions 16:10, 13,14</p> <p>decline 107:5</p> <p>defend 92:2</p> <p>define 48:5</p> <p>definitely 16:21</p>	<p>degree 6:3</p> <p>degrees 26:25</p> <p>delay 92:11</p> <p>delayed 42:24,25</p> <p>demote 44:4</p> <p>department 28:18 35:9 36:18 38:11, 17 97:20 98:3 100:14,16,17 105:11</p> <p>departure 59:8</p> <p>depending 25:5 40:24 41:18 98:5</p> <p>depends 27:14,24, 25 42:11 110:19 112:21</p> <p>deploying 88:10</p> <p>deposed 4:12 9:25 10:1</p> <p>deputies 9:13 14:5, 18 15:4,9,19 32:10 39:1 46:21 65:4 72:7 78:18 79:25 96:24 97:2 110:21 111:7</p> <p>deputy 6:9,19,20, 23,24 7:2,20 11:6 12:1 13:15,16 14:4, 10,13,22 16:1,2,3, 4,7,8,22 25:17 26:1 46:23 48:9 58:4,13 64:6 67:20 68:21, 23,24 69:2,18 75:3 94:25 95:2 96:10, 11,12 97:3,4,6,12 100:23 106:21 107:20 110:25 111:1</p> <p>deputy's 109:25</p>	<p>describe 79:4</p> <p>describes 67:8,10</p> <p>designate 85:9</p> <p>designated 12:17</p> <p>desk 82:6 104:24</p> <p>details 56:13 80:23 87:5</p> <p>detect 85:24</p> <p>detective 14:22,25 15:6 98:8</p> <p>detectives 14:20 15:11 98:6</p> <p>determine 30:18,23</p> <p>determined 100:24 101:3</p> <p>did 4:8 5:16,21,22, 23,25 6:2,10 7:5,20 9:3,4,22,24 10:9 11:10,13 16:1 17:6, 11,15,17 19:25 24:5 30:8,13 31:1, 4,18,22 33:1 34:7,8 35:19,20 36:7 44:13,15,16 49:4, 10 51:5,6,25 52:13, 14,15,25 53:10,21 54:7 55:8 56:12 57:15,18,23 58:7, 21,24 60:16,21 61:13,22 62:11 65:22 71:21 73:22 74:4,25 77:3,8,15, 18 78:8 81:3 87:13, 15 97:12 98:14 99:10,16 100:6,8, 20 101:4,8,15 102:1 103:14,15 104:24 107:15 111:22</p>	<p>didn't 6:5 11:10 21:7 30:10,14 34:19,20 35:4,21, 22 36:9,19 41:2 46:6 57:8,18 59:19 62:5 88:6 95:20,21 102:21,24,25 105:18 107:18 109:19</p> <p>die 95:20,21</p> <p>difference 61:11</p> <p>different 13:6 26:14 37:6 83:15 110:7,8</p> <p>differently 59:22 76:23</p> <p>direct 51:5,8,11 66:13 103:1</p> <p>directed 104:20</p> <p>directing 107:3</p> <p>direction 88:19,24</p> <p>directive 45:13,17 58:23</p> <p>directly 16:4 35:16</p> <p>discharge 107:16</p> <p>discharged 63:25</p> <p>disclosed 19:7</p> <p>discovered 111:13</p> <p>discretion 112:2,5, 6,7,8,10,12,16 113:3</p> <p>discuss 11:17 61:13</p> <p>discussed 31:14 61:18,19 62:10,22, 24 63:7,8 71:11</p> <p>discussion 101:21</p>
---	--	--	--

<p>discussions 61:22 63:4</p> <p>dismissed 109:9, 23 110:1</p> <p>dispersant 71:12</p> <p>dispersants 74:13</p> <p>disposal 68:25</p> <p>disposition 85:7</p> <p>district 7:23</p> <p>division 6:24,25 9:3 15:8,10,17 17:10 35:12 37:7,8, 10,12,17 103:1</p> <p>divisions 37:10</p> <p>DMV 26:17</p> <p>do 7:25 12:5,23 13:24 14:6 17:24 18:20 21:13 22:20 25:9 26:12 27:20, 22,23 28:1,8 30:13 31:4 34:9,19 35:8,9 38:2 40:2 41:2,20, 22 42:6,21 43:7,22 46:13,19 48:16 49:4,18 50:6,18 55:11 56:13,20 57:1,3,9 59:8,13 60:15,17 61:4 62:16,19 68:20 70:10,24 71:18 73:6,10 74:4,23 76:1,10 78:18 80:4, 7 81:5,7 82:19,20 83:9,12 84:5,18 87:7,8,9 89:5 90:15 91:1 97:13,16,17 98:9,12 99:20 101:2,7,8 102:18 105:10,23 106:7,17 110:7</p>	<p>document 17:21 18:9,11,12 19:10, 19 22:1,3,9,20 23:14,15 47:20,22 48:3,5,17 51:16 58:8 86:13 89:10 90:15,17 91:1,2</p> <p>documentation 43:17</p> <p>documents 21:10 22:21,24 23:1 24:1 26:25 27:10 43:18 48:7 49:16 55:20</p> <p>does 9:12 11:23 29:9 37:11 38:13, 14,15 42:9 47:4 63:23 66:7,11 69:14 71:25 72:6, 10,14 75:10 78:6 82:15 84:17 85:16 98:2 112:2</p> <p>doesn't 29:25 60:18 69:12 106:8 112:7,15 113:3</p> <p>dog 39:13 78:22 79:8,9 80:21,24 86:22,24,25 95:1</p> <p>dogs 78:24 105:4</p> <p>doing 9:2,7 16:18, 21 32:12 33:14,15 35:4 57:2 80:25 98:18,21 99:2,4 100:10 103:18 105:6,8 109:20</p> <p>domestic 110:21 111:1,7 113:25</p> <p>don't 4:24 7:18 8:18 9:19 11:19,20, 21,22 12:18,21,24 16:16 17:4,15 20:24 24:9 27:14</p>	<p>28:5 30:4,15 32:7, 8,12 34:24 35:12, 15,17 37:21,22 39:19,20,21 40:1 42:15,16,22 43:1,2, 7 44:11,25 45:16 49:6,9,23 51:4 52:4,5,14,15,17,21, 23,24 53:1,2,22,25 54:8,11,14,15,19 55:7,10 56:4,5,8,13 57:24,25 58:1,5 59:9,12 61:6,10,11, 20 62:4,18,20 63:2, 16 65:17,20 66:2,5 67:9,22 68:2,10,13 69:9 70:8,10,19,20, 21,22,23 71:14,17 72:16 75:15,23 77:22 80:9,20,23 81:4 83:2,3,7,16,20 86:1,6 87:4,6,11 88:9,13,21 94:18 96:4,21 97:14 98:10 99:18,23,24, 25 100:16 101:14 104:15,16,25 105:2,13,19,20,23 106:7 108:9,19,20 109:17,24 110:9,23 111:11 112:1,4</p> <p>done 12:5 13:3,4,5 14:1 23:25 26:18 28:10,23 33:2 34:2, 4,13,14,15 35:5 57:4,5 59:22 60:6,7 76:23 98:20 102:12,14,15 109:10 110:5</p> <p>down 10:20 17:4 19:4,9 22:13,15 27:15 31:20 33:5 39:23 42:7 52:9 60:3,13,17 71:3,4</p>	<p>84:9 90:16,17 101:2 107:4,7,11</p> <p>drafting 48:17</p> <p>draw 41:5 64:11</p> <p>drew 41:1,2 64:19</p> <p>drill 4:15</p> <p>driver 53:5</p> <p>driver's 24:13 27:1</p> <p>driving 20:2,13 24:4 39:23 106:22</p> <p>drop 95:3</p> <p>drove 107:22,23</p> <p>drug 6:11 10:16 15:12 79:22,24 83:23</p> <p>drug-sniffing 80:2</p> <p>drugs 80:5,8 85:25</p> <p>dual 80:1</p> <p>due 35:1</p> <p>duly 4:3</p> <p>Durham 5:11 36:13,18</p> <p>during 32:3 52:8 56:6 63:4 80:24 83:23</p> <p>duties 8:25 13:8 38:3</p> <p>duty 107:17</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>each 23:7 78:20 109:10</p> <p>earlier 59:3 60:25 77:19 86:19 100:10 102:21</p>
--	---	---	--

<p>early 9:5 34:16 73:16 77:20 98:17 100:19 103:25</p> <p>ease 4:17</p> <p>easily 105:3</p> <p>education 6:2,5 20:8</p> <p>effect 58:16 70:22 92:5 106:5</p> <p>effective 45:18</p> <p>effects 46:24</p> <p>egregious 44:21 82:3</p> <p>either 8:22 20:3 51:13 54:16 102:24</p> <p>else 11:10 27:23 41:2 42:6 75:6 81:17</p> <p>email 21:6,15</p> <p>emails 21:7,8</p> <p>employ 78:7</p> <p>employed 48:20 68:9,12</p> <p>employees 15:3</p> <p>employment 19:16 21:3 24:6,8,13,22 35:10 37:4,20 59:10</p> <p>employs 71:19</p> <p>encompass 99:7,9</p> <p>end 65:23 91:21</p> <p>ended 53:11 65:19 101:11 107:17</p> <p>enforce 112:3,10, 12,16,17</p>	<p>enforcement 6:11 7:7,9 13:13,14 14:1 27:2,4 60:2 65:19, 22 91:16,21,23</p> <p>engage 40:17</p> <p>engagements 40:13</p> <p>enough 14:12 40:4 44:21 104:4</p> <p>ensued 96:11,15</p> <p>entail 19:25</p> <p>entailed 7:22</p> <p>entity 85:13</p> <p>envelope 10:18,19, 20</p> <p>escalation 44:10</p> <p>escape 92:5,7,11 93:4</p> <p>evaluates 47:3</p> <p>evaluation 77:4</p> <p>even 10:25 11:3 27:24 33:10 34:4, 16 64:4 70:17 104:23</p> <p>eventually 17:9 42:6 104:24</p> <p>ever 4:12 9:22 10:9, 12 11:13 28:3 68:7, 11 70:6 74:12 79:1 83:24 100:6,8</p> <p>every 12:22 28:23 66:3</p> <p>everybody 4:16 25:22</p> <p>everything 43:21 51:12,14 107:22</p>	<p>evidence 9:3,11,14, 16 10:8,10,11,12, 24,25 11:1,4,7,8,12 37:15 107:19</p> <p>exact 52:5 66:6 71:7 99:25</p> <p>exactly 49:10 52:4 56:8 63:14</p> <p>EXAMINATION 4:5</p> <p>examined 4:3</p> <p>example 28:10 65:4</p> <p>examples 39:17,18, 21</p> <p>except 57:11</p> <p>excessive 70:2 76:9 81:9 82:9</p> <p>excitedly 70:15</p> <p>exhibit 20:22,25 21:2 24:1 46:1,2,11 48:13,14 66:15,18, 19 68:15 71:2,9 84:2,3 86:5,6,13,14 89:2,7,12 90:23,24 92:15</p> <p>exhibits 21:4 46:4, 6,9</p> <p>exist 84:17</p> <p>existed 87:5</p> <p>exists 84:14,15,19</p> <p>exonerate 44:3</p> <p>exonerated 61:9 95:13,14 96:13,17 97:6,13,15 108:21</p> <p>expected 40:6</p> <p>experience 14:11 66:1</p>	<p>experienced 69:22, 24</p> <p>explain 7:22 16:25 26:9 42:1 48:19 58:18 60:9 63:17 72:22 73:1,13 74:15 76:12 106:20</p> <p>explained 77:1</p> <p>explaining 108:15</p> <p>extensive 20:15,17 21:23,24 40:24</p> <p>extensively 17:16</p> <p>extent 56:25 87:6 108:18</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>F-3 12:4 17:3</p> <p>fact 33:1</p> <p>factor 77:3</p> <p>factual 52:16</p> <p>faded 63:13</p> <p>failure 107:16</p> <p>fair 19:6 51:17,20 52:7 94:13</p> <p>familiar 28:15 44:23,24 63:10 76:11,25 84:13,15, 18 85:18 86:17 89:17,19,20,21</p> <p>far 10:18 99:1 103:6 107:18</p> <p>fashion 9:20 22:14 34:14</p> <p>fatality 95:21</p> <p>favours 110:13</p>
---	---	--	---

<p>federal 85:13</p> <p>feel 35:19,21 41:15 59:14,15,17 78:15</p> <p>feeling 59:17,19</p> <p>fell 27:19</p> <p>felon 93:2</p> <p>felons 79:16</p> <p>felony 79:14 92:13, 18 93:6,10,13</p> <p>felt 40:18 44:21 82:1,2</p> <p>few 22:8,9 67:19 103:6</p> <p>field 90:2,5,6</p> <p>fight 108:1</p> <p>fighting 108:5</p> <p>figure 38:25</p> <p>filed 49:1,3,5,11 104:11</p> <p>filled 17:2</p> <p>final 29:25 30:1 85:6</p> <p>find 71:7 110:7</p> <p>fine 4:23 86:2 109:21</p> <p>fingerprints 37:16</p> <p>finish 14:4 29:12 91:17 102:8</p> <p>finished 7:12 43:21 55:21</p> <p>fire 96:12</p> <p>firearm 63:23 89:23</p> <p>firearms 89:17 91:14</p>	<p>fired 31:15 96:12, 16 97:5 101:11</p> <p>first 6:21 17:13,14 29:4,11 35:22 36:6 50:7,8 53:10,15 54:1,4,19 62:25 67:14 85:3 90:15 98:18,21 99:2 112:22</p> <p>first-line 14:16</p> <p>first-time 44:20</p> <p>fit 25:1 63:23</p> <p>five 32:18 106:15</p> <p>five-minute 113:9</p> <p>flare 104:18</p> <p>flares 107:2</p> <p>flip 57:6</p> <p>follow 66:8,12 71:21,22,25 72:11, 14</p> <p>follow-up 84:20 113:15</p> <p>following 53:12,13 72:3</p> <p>follows 4:4</p> <p>foot 108:9</p> <p>for 4:17,21 5:5,14 6:14,25 7:10,11,14 11:11,22 12:8,9 13:23 15:25 17:4, 24 18:22 19:1,16, 19 20:9 21:2,4 23:4,5,6 24:8 25:8, 11,13,18 26:25 27:25 28:8,10,17, 20 29:1,10,20 31:1, 15 36:9 37:13 40:1, 9,18 41:12 46:11,</p>	<p>25 47:13 48:14 54:15 55:20 62:2, 14 66:19 67:25 71:5,12 74:24 76:3, 14 78:16 79:16 80:2,5 84:3 85:3,11 86:14 88:11 89:7, 18,23 90:14,24 91:17,24 92:13 93:8 96:1,8,22 100:3,5,19 101:20 102:8,9,16 104:4, 17 106:3,4,5 107:7, 11,15 108:14,15 109:7 110:4,24 111:12 113:15</p> <p>force 39:12 40:11 42:8 47:4 48:9 63:22 64:1,2,24,25 70:1,2 71:16 72:19 73:5 75:11 76:9 77:23 81:9 82:10 91:10,15,24 92:4, 25 93:11 94:16,19 95:10 96:13 97:21 99:8,9</p> <p>form 9:20 12:4 17:23 18:13 33:20, 21,22,25 34:14 38:21</p> <p>formal 29:6</p> <p>formally 34:20</p> <p>format 33:13</p> <p>forms 23:2 26:14 33:2,3 38:19</p> <p>formulating 32:22</p> <p>found 91:3</p> <p>four 101:9 106:15</p> <p>fourth 67:16</p> <p>fracture 69:4,8</p>	<p>frame 42:15</p> <p>Franklin 23:17</p> <p>free 5:2 78:15</p> <p>fresh 80:20,22 81:1</p> <p>friend 104:9</p> <p>from 6:22 8:2 10:5, 23 13:14,17 14:24 20:3,4,5 21:19 23:6 31:15 36:11,13,17 43:5,15,16 45:12 47:25 48:8,23,24 49:22 59:10 75:6 76:5 82:9 85:9,12 89:5 92:3,5,11 93:5 94:10,14 96:25 100:13 101:22 102:25 103:1,9 108:5 109:23 110:13 111:2 113:12</p> <p>front 45:16 65:5 68:17 84:6,25 112:14 113:1</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>gather 18:13 30:21 42:3 43:15,16,18</p> <p>gathered 27:6 48:21 49:16</p> <p>gathering 55:20</p> <p>gave 79:17</p> <p>gears 11:16</p> <p>Geis 20:24 21:6,7, 16 22:6 36:14 37:23 46:1,3,8,12 47:24 61:18,20 63:1 66:14,15,25 67:2,4 76:16,18,20 86:5 89:1,3,5</p>
---	--	---	---

<p>101:14</p> <p>general 24:10 68:6</p> <p>generally 26:12 57:12</p> <p>generate 40:19</p> <p>generated 38:10,24 111:2</p> <p>gentleman 111:14</p> <p>gentlemen 32:4</p> <p>get 19:20 21:7 25:14,23 26:22 27:7,13,14 28:5,21 30:2 33:11 39:24 40:6 41:14 44:14, 15 45:2 47:16,22 49:22 53:16 59:17, 25 62:6 70:5,12 73:14 74:8,10 102:11 107:18 108:4,22 109:4</p> <p>get all 29:24</p> <p>gets 97:20</p> <p>getting 26:21 42:24 52:2</p> <p>gist 62:15</p> <p>give 22:8,9 24:14 32:17 71:6</p> <p>given 7:24 83:16</p> <p>gives 91:13</p> <p>giving 57:17</p> <p>glad 97:18</p> <p>glass 108:3,10</p> <p>glasses 69:1</p> <p>go 5:16,21,23 9:22 10:2 12:3 13:21 18:3,4,5 19:3,4,9</p>	<p>20:1,2 22:4 23:7 24:10,24 25:8,15, 18,21 32:2,5,6 34:19 38:3,7,8 40:21 42:5 47:22 50:1,4 51:22,25 57:5 62:12 66:22 68:14 71:3,5 72:7 75:13,21,24 76:1,4, 18 78:10 81:17 82:20 83:6 84:9 85:1 91:7 92:14 101:20 104:16,17 107:20 113:10</p> <p>God 46:6 106:6</p> <p>goes 25:16 79:19</p> <p>going 4:7 10:7 12:4 13:18 17:18 18:2,3 19:12 20:22 22:8,9 23:6,24 27:6 29:23 31:25 33:4,5 40:17 41:15 47:10,22 50:2 56:8 66:12,23 79:18 90:5 96:24 98:20 99:17,19 102:8,11 105:23 106:4,9,10 109:12, 13</p> <p>gone 13:19 24:25 35:15 104:21 111:11</p> <p>good 4:7 36:24</p> <p>Goolsby 49:20 54:6,24 55:4,16,19 56:3 58:12 77:16 93:18,21</p> <p>got 11:6,11 17:7,9 33:6 34:18 39:9,10, 11,12,13 53:6 56:10 62:6,7,8,9,12 63:20 64:23 80:24 81:2 86:24 96:11,</p>	<p>23 102:9 107:22 108:1 111:13</p> <p>gotten 20:7 26:19, 20 27:3 51:12</p> <p>grabbed 74:17</p> <p>grabbing 65:1</p> <p>graduated 20:4</p> <p>grazed 97:11</p> <p>Gregory 36:13</p> <p>grievances 104:12</p> <p>ground 59:1 60:3, 13,18,21,24 68:3, 24</p> <p>guess 107:16 108:19</p> <p>guiding 65:6</p> <p>gun 10:22 11:6 37:14 41:1,2,5 64:7,10,19 87:18, 22,24 88:2,6,10,15 89:4</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>had 7:11 8:17 10:12 11:2 15:17,23,24 16:2 17:3,16 19:7 20:7,9 24:10 25:8 26:3,24 27:3,15,21, 22 31:14,16 32:20 33:12 34:6,14,20 35:24 36:2 42:19, 20 43:21 44:7,8,19 45:24 46:16 48:2 51:1,3,8,12 52:10 56:17 64:23 70:6, 17,21,22 73:6,23 74:2,3,7,11 75:3,4 77:12 79:5,16,21 80:1,21 81:2 85:23</p>	<p>86:22 89:11 94:16, 25 96:1,3,6,8 98:6 100:1,9,11,21 103:12,22 104:6 105:24 106:22,24 107:6,21,24 108:1 109:9 111:11</p> <p>hadn't 14:1 93:7</p> <p>half 53:23</p> <p>Hampshire 23:12, 13</p> <p>hand 33:8 65:2 74:18</p> <p>handcuffing 65:3</p> <p>handcuffs 53:15,17 65:5</p> <p>handgun 37:14</p> <p>handle 105:5,7</p> <p>handled 104:22</p> <p>handler 78:20,21 80:17,22 81:3,5 82:2 83:7</p> <p>handler's 78:21</p> <p>handlers 78:7,23 81:13</p> <p>handout 90:12 91:11</p> <p>hands 63:20 64:11, 22,24 65:1,2,4,6,8, 10 74:20,23</p> <p>haphazardly 33:3</p> <p>happen 11:14 105:24</p> <p>happened 8:7 26:9 39:1 41:21 43:18 52:11 66:3 87:6 108:2</p>
---	---	--	---

<p>happens 25:4,23</p> <p>hard 63:20</p> <p>harmful 70:18,22</p> <p>has 13:3,4,5 14:10, 11,14 25:22 29:22, 25 48:12 63:13 65:19 66:3,14 67:20 68:25 70:6, 21 75:22 79:1,8,9 80:15,17 81:9,10, 25 82:2 83:17 84:1 89:12 93:8 98:19 100:9,11 105:12,17 106:5 112:5,6,9,12</p> <p>hasn't 82:1,5 93:13</p> <p>have 4:9,12,15 5:1, 12 7:17 12:2,25 13:1,2,6,7,18 14:9, 21 15:2,5,7,8,9,11, 12,15 16:1 17:12 19:9,11 20:1,2,8,9, 13 21:13 24:5,12, 23,25 25:1,7,9,10, 19 26:3,5,6,18,19, 24 27:3,9 28:6,7, 14,16,19 30:1 32:10,12,13,14,15, 22 33:23 34:3,10 35:15,17 36:24 38:22 39:8,19,25 40:2,5 41:13,18 42:15,17,22 43:1,2 44:25 45:16,24 46:16 47:7 49:14, 15,23 51:5 52:1,14, 16,18,20,21 54:5,9 57:8 59:22,23,24, 25 60:2,6,7,11 61:1,6,8,9,10,13,22 62:22 63:4,12,22 64:5,8,12,24 65:17, 20 67:20,22 68:7, 11,16,17,18,19,22,</p>	<p>23 69:10,17,19,22, 23,25 70:2,9,23 71:22 72:18,23 73:5 74:6,12 75:12, 13 76:1,23 78:3 79:16 80:9 81:8,15, 21 82:4,11,19 83:5, 24 84:5 88:7,9,13, 21,23,25 89:5,11 90:10 91:3 92:25 98:2,4,9,14 99:22 100:12,18 102:1, 18,21 103:23,25 104:11,15,16,19, 21,22,25 105:1,10, 16,21 106:7,10 108:17 110:7,18 111:2,3 112:2,7,15, 16 113:3,14</p> <p>haven't 45:1 69:25 75:5</p> <p>having 4:3 12:4,5 42:5 55:13,14 70:8, 12 97:16 98:20</p> <p>he 10:17,18 11:23 12:24,25 13:1,2 14:18 17:2,3,4,9 19:7 20:10 24:11, 23,24 25:7,16,17, 18 26:3 27:1,21,22 28:12 29:25 30:5, 18 31:14,16,24 33:8,10 35:8,22,24 36:2,4,5,7,9,19 50:8,22 51:21 52:9, 10,25 53:2,3,4,6,7, 10,12,13,15,16,17, 19,20 56:14 57:2, 18,20,23,24 58:20, 25 59:1,23,24,25 60:6,7,17 61:24 62:3,5,6,7,9,25 75:19,21 86:23 87:11,15 90:17</p>	<p>92:3,6,9,24 94:10 95:5,13 96:16,17, 24 97:1,2,11 100:24 101:2,3 102:25 103:1,3,19 107:11,12,15 108:6 111:13,15 112:16</p> <p>he'll 24:24 57:5,6</p> <p>he's 4:10 20:3 25:16,25 31:24 35:11 47:21 57:20 79:20 103:4,5</p> <p>head 45:23 66:2 73:7,18</p> <p>hear 82:16 102:24</p> <p>heard 75:5 101:16 106:8</p> <p>heightened 79:12</p> <p>hell 50:8</p> <p>help 13:11 100:6,8, 9,13,17 103:20</p> <p>helped 101:10</p> <p>helpful 46:3,8</p> <p>helping 100:1,11</p> <p>her 36:21 53:5,9, 15,17 58:20 59:2, 23,24,25 60:17,23 69:4 87:6 95:3,5 110:1</p> <p>here 4:10 7:8 18:18 26:14 28:12 33:13 34:18 36:23 71:6 75:15 76:18 84:22 89:9 91:18 102:11 109:14</p> <p>Hey 41:20 61:25 62:12 82:17</p> <p>high 5:16,17,20</p>	<p>20:4 97:3 107:9</p> <p>higher 13:10 20:7</p> <p>Hight 113:17,24</p> <p>highway 106:23</p> <p>Hillsborough 23:12,13</p> <p>him 17:5,8 22:13 24:22 25:15 27:7 29:10,24 30:7,8,14, 23 31:5,9,17,21,25 35:12,13,17 53:5, 16,19 56:21,22,23 57:1,4,7,16,17 63:1 73:7,15 92:12,22 93:5,21,22 95:5 99:1 102:22,24 103:2 104:9 107:11 108:5,8,10</p> <p>himself 92:2 111:15</p> <p>hindsight 76:11,16 77:8,9</p> <p>hire 12:15 13:20,24 16:10,13 17:8 25:19,20 29:1,3,4, 8,10,14,16,20 31:5, 6,17,25 32:15,16 36:19,20,24</p> <p>hired 13:19 17:9 25:17 27:7 30:6,7, 9,11,14,19,23 31:9 32:11 33:6,8,9,11 35:7</p> <p>hiring 11:17,20 12:1 16:13 17:1 31:2 33:23 37:3</p> <p>his 17:6,11,13,14, 17,18,22 19:17 20:1,2,13 24:4,5,7, 8,12,13,22 25:8,16</p>
--	---	--	---

26:3,4,6,8,25 27:3, 16 35:10 49:15 52:10 53:11 59:24 68:25 80:22 90:18 92:8 100:23 108:9 110:1 111:13,15, 16,17 histories 20:10 history 24:10,13,14 hit 73:7 hold 36:4 60:12 71:5 102:15 holding 65:7 home 100:25 107:8,9 homicide 10:5 38:6 honest 46:6 horns 35:4 hospital 48:24 87:7 hour 53:23 hours 102:16 house 53:8,9 100:25 110:25 how 6:20 7:10,18 8:14 9:17 24:15 27:19,21 28:1 29:9 32:9,22 33:12 35:19,24 36:2 39:20 40:24 42:9, 14,16,23 43:2 49:12 51:25 52:7 53:21 58:18,24 60:21,25 61:7 62:22,25 63:2 72:22,23 76:2,4 77:1 80:4,7 82:9,20 94:16,18 97:10,12, 14 99:24 102:7 104:25 105:14	106:14 110:9 112:2,5 however 13:24 15:19 32:5 Huh 76:19 88:4 humerus 69:4 hunt 79:16 hurt 40:25 hurting 109:12 hyperventilate 70:13 <hr/> I <hr/> I'D 32:22 76:10 I'LL 19:19 57:5 78:10 84:22 I'M 4:7 7:10 8:22,23 10:7 11:20 13:13 17:18 22:8,9 23:24 26:20 30:2,25 31:25 32:2 33:3 36:1 37:13 47:10, 22 49:24 50:2 52:19,21 57:4,6,12 59:18 62:4 66:5,12, 23 67:5 70:13 71:4 72:2 80:6 84:14,17 85:18 86:9,11 88:3, 5,20 89:19 97:18 100:7,15 102:11, 12,14,19 105:4,23 106:4,9 109:12,13 110:12 111:20 I'VE 10:1 32:12 33:15 37:5 56:22 57:16 63:1 74:2,7, 16,17,20 98:6,16 105:20,22,24 106:8 108:13	idea 82:11,12 105:16 identification 21:4 46:11 48:14 66:19 84:3 86:14 89:7 90:24 identified 48:12 61:15 identify 18:11 22:5 23:1 45:10 80:8 if 12:24 14:21 17:15 21:14 22:12 24:19 25:16 26:9 30:13, 17,18 32:19 33:24 37:21,22 38:23 39:12,22 40:4,18 41:23 44:7,21 45:5 46:12 47:11 52:22, 23 60:15 63:25 64:4,10,19 66:21, 25 68:2 69:16 70:17,21 81:5 82:12,16 85:19,21 87:7,9,11 91:16 93:15 97:19,20 99:23 105:17,22 108:9,17 109:15 110:24,25 111:4 112:4,14,18,22,24 113:1,10 illustrates 50:5 illustrations 50:10, 15 imagine 52:14,15 87:4 immediately 24:25 112:19 imminent 92:4,9 impair 5:3 impede 40:5	imposed 92:12 93:5,9 in 4:17 5:11,12,15, 18,25 6:4,16,22,25 7:8 8:6,7,8,13,14, 18,21 9:3,5,9,15, 17,20,23 10:2,3,9, 12,15,19,23,24 11:11,14 12:3,4,9 13:13 14:2,8,18,19, 21 15:11,17,20,25 20:10 21:19 22:13 23:2 24:10,22,23 25:6,10,16,25 26:9, 13,14,20 27:5,19 28:22 29:24 31:18 32:2,5,6,9,10,17, 24,25 33:4,7,10 34:14,15,21,25 35:1,16 36:4,5,7,21 37:4,6,8,9,16,19 38:18 39:2,4,23 40:4,12,25 43:1,9 44:8 45:1,14,16 46:22,24 47:14,25 49:22,24 50:22 51:14 52:9 54:17, 18,19,20,21,22 55:1,2,3,5,6,18 57:5 59:21 60:1 62:10 63:23 64:16, 17 65:20,24 66:2,6 67:18,19 68:8,17, 19 69:3,4,10 70:10 71:19 72:19 73:7, 15,18 75:1 76:5,8, 13,22 77:9,19,20, 21 79:5,8,12,16,18, 19,23 80:2,14,21, 22 81:1,8,25 82:2, 10 83:6,13,16,17, 19,20,21 84:5,25 85:12 87:10,12,14 91:13,15,23,25
--	--	---	--

93:9,16 94:13,14, 16 95:7,25 96:1,11 97:11,16,21 98:5, 16,17 99:18,23,24 100:9,20,23 101:13,22 103:1,2, 5,10,12,14,23 104:2,18 106:18 107:25 108:2 110:10,21 111:1,6, 7 112:9,14,22,25 113:1,4,6,12,19	individuals 73:25 ineffective 69:1 information 18:13 23:4 26:21 27:16 28:5,7,22 29:24 30:22 34:17,22 37:16 38:24 42:3, 25 48:8,22,23 informed 92:21 infraction 110:17 initially 6:18 56:15 73:16 94:11 injured 59:11 67:18,21 73:20 79:2 82:5 87:3 95:19 97:8 injuries 87:6 injury 69:16 92:10 inside 108:5 instance 14:19,21 36:7 95:24 instances 39:4,7 74:1,15 75:1 81:8 94:24 106:17 110:21 111:6,9 112:9,11,13 instruction 46:22 instructor 88:6 91:4,12 interact 35:13 interacting 35:16 interaction 102:22 interchangeably 90:7 interference 90:3 intern 6:13	internal 97:19 98:2, 21 99:6,7,18 interstate 106:22 interview 12:8,9,12 26:3 27:17,21 28:14,19 29:13 43:14 interviewed 17:5 30:17 32:4 93:18, 20,23 interviews 27:21 28:4 48:25 intimately 84:14,18 89:20 into 10:25 11:1,3,7, 8,12 76:10 77:3 79:6 90:6 96:23 97:1 100:25 104:21 111:13 introduce 4:9 21:10 intrusive 65:10,14 investigate 43:10 81:3 105:18 investigated 47:14 59:4 95:10 investigation 8:18 15:20 25:22 32:24 38:20 40:19,20 41:9,24,25 42:2 48:8,20 52:12 53:10 55:12 56:6, 21 61:14 72:20,24 75:2 76:9 77:9 92:15 97:17 98:22 99:18 101:2,10 103:15 investigations 7:1 8:8,9,10,11,20 9:4, 5,7 14:20 15:5 37:15 40:13 42:10	50:25 51:3 57:1 61:1 76:8 81:12 98:15,19 99:5,6 100:2,4,10 103:8, 18 investigative 9:6 10:23 investigator 6:22 8:16,17 9:19 25:21 58:13 101:5,18 103:11 investigator's 25:20 investigators 9:13 15:4,22 100:21 involved 9:21 38:18 44:8 70:10 72:19 97:16,20 103:12 110:21 111:1,7 involvement 40:12 is 4:21,23 8:4 9:25 12:13,16 13:23 14:15,16,18 15:1,5 17:19 18:15 19:6 22:23 23:14 25:4, 11 26:22 27:5,8 28:18 29:21 30:21 32:1 33:13 34:2,17 35:15 36:21 38:9 39:5 40:3 42:2 44:2,18 45:13,21 46:1,2 48:6 49:1 50:14,21 51:16,18 54:23 56:14 57:8, 21,22 58:11,14,16 59:11 62:25 64:7 65:10,11,14 66:15 67:7,12,14,15,16 68:15 69:13,17 70:12 71:1,9 73:13 75:15 76:10,17,22
---	---	--	--

77:23 78:20 79:12 80:21 83:5 84:20 89:14,22,24 90:2, 11,21 91:2,10,12, 23 92:1,6 93:7,10 94:10,21 95:7 96:15 97:22 98:11 101:19,20 105:3,12 106:2 108:17,24 109:1,2,5,9,10,12, 22,25 110:5,15,16, 17,20,23,25 111:1, 18 112:6 113:15 isn't 50:14 67:17 94:6 issuance 46:20 issue 68:1 issues 47:7 it 6:5 7:16,17,18 9:15,21 10:21,24, 25 11:1,3,7,8,11 12:4 13:4,5,24 15:13 16:21 17:1,3, 15,16,22,24 18:16, 20,22 19:6,11,19 20:15,17,18 21:22, 24 22:4,10,17 27:8, 11,14,15,23,25 28:8,23 29:4,6 30:13 31:23 32:6, 21 33:2 34:15,19, 21,25 35:4,5,21,22 36:6,22 37:5 38:4, 14,17,23 40:7,18 41:16,23 42:4,5,6, 11 44:3,4,20,21,25 45:1,5,16 46:3,8 47:11 49:9,10 50:1, 4,7,9 51:6,12,13 53:1,3,10,23 54:5, 11,13 55:12,21 56:22,23 57:2,6,9, 17,22 58:11 59:9, 12,15,17 61:18,19 62:6,7,8,9,10,15, 20,25 63:14,15,16, 25 64:5,7,11 65:21 66:5,14 67:11,17 68:16,18,19,21,25 69:3,8,14,16 70:13 71:1 72:6 73:17,23 75:6,15 76:12,13 77:1,10 81:10,11, 23,24,25 82:3,5,13, 16,17 83:3 84:14, 15,16,17,18,21 85:18 86:25 87:5 89:2,19,20,21 91:4, 5,16,20 92:1 97:12, 14 98:3,5,7 99:22, 24 100:1,24 101:3, 8 102:4,6,7,19 103:3,6,23,24,25 104:1,2,4,8,17 106:2 107:16,18 108:9,20 109:7,11 110:14,15,18,20,24 112:21,23 113:17, 24 it's 13:9 15:2,3 18:12 22:8 26:23 28:22 32:19 38:10, 21 39:22 45:21 48:7 50:22 51:16, 20 57:2 63:25 64:4 66:25 73:17 75:18, 23 78:21 82:18 89:5 91:18 100:19 102:8,18 104:14 106:3 110:10 111:4 items 11:8 its 46:22 <hr/> J <hr/> J.J. 61:25	jail 108:14 Jersey 5:15 6:12 job 8:25 13:20 40:3 105:6,8 jobs 14:12 judge 85:8 jump 96:25 just 4:8 13:11,13 15:3 17:2,24 18:2 21:10 22:13 23:5,9 24:19 27:14,22,23 28:8,22 29:22 30:2 32:17,23 35:3 38:22 39:17 41:18, 20 44:18 47:11,22 49:16 52:22 55:6, 12 57:2 59:15,17 63:17 64:4,10 65:7 66:13,21 68:5 72:6 78:15 80:11,16 84:8 87:5 92:24 99:25 101:19 102:1 103:3 104:15,24 105:2 107:13 109:14,19,20 110:15 113:9,15 justice 6:1 justification 93:10 justified 91:23 Justin 58:13 <hr/> K <hr/> keep 18:2,3 19:12 65:20 66:2 83:12 kept 61:8 kick 67:11 kicked 108:3	kicking 108:6,10 killed 31:24 95:23 112:20 Kimberly 36:13 kind 13:22 14:12,25 25:10 35:21 38:25 41:14 47:11 55:12 60:12 63:17 80:18 82:20 87:21 107:5 knew 41:16 know 4:15 7:18 8:12,18 9:20 11:19, 22 12:11,21,24 13:1,14,22,23,24 17:4,15 18:2 21:15 22:10,13 24:24 25:18,25 26:13 27:25 28:19,22 30:4,5 32:2 34:15, 24,25 35:14,15 37:2,21,22 38:3,23 39:20,21 40:1,3,24 41:15,20,21 42:16, 19 43:7,11,21 44:11 46:5,9 49:6, 10,23 52:4,5,10,16, 17,21,23 53:1,2,25 54:8,9,19 56:5,8,22 57:2,4,5,16,21,24, 25 60:15 61:6,11, 20,24,25 62:4,5,7, 13 63:2,14 66:4,5 67:9 68:2 70:8,10, 19,20,21,22 72:16 74:9 75:15,22 76:1, 14 78:11 79:23 80:9,20,21 82:12, 21 83:2,3,5,7,9,16, 20 84:14,15,17,18 86:6 87:5,6,7,8,9, 11 89:22 94:18 96:4,21 97:14 98:10,16 99:22,23,
---	---	---

<p>24 100:9 102:15 103:5,13,24,25 104:18,23 105:13, 19,20 106:2,4,9 108:9,19,20 109:3, 10 110:9,23 112:4 113:10</p> <p>knowing 32:14</p> <p>knowledge 55:13 70:23 78:16 80:10 104:23 105:10</p> <p>known 80:12</p> <p>knows 57:2</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>laboratory 85:15</p> <p>lady 36:12,17 59:1 80:24 86:24,25 95:1</p> <p>lake 96:23</p> <p>last 18:6 19:14 23:22 29:12,23 42:15 53:21 68:21 96:14,19 107:11</p> <p>later 62:7</p> <p>lateral 14:25</p> <p>Latwanya 48:10</p> <p>law 7:7,9 13:13,14 14:1 27:2,3 60:2 65:19,22 91:16,20, 23 112:3,10,12,16, 17</p> <p>Lawrence 61:19</p> <p>lawyer 10:20</p> <p>leadership 67:21</p> <p>learned 66:4</p>	<p>least 7:16 94:23</p> <p>leave 47:11 57:8</p> <p>leaving 18:23 19:1 107:20</p> <p>left 32:21 69:4 76:7</p> <p>leg 60:7</p> <p>legal 75:14 108:20</p> <p>length 62:16</p> <p>less 6:15 42:21 65:10,14,15 93:8</p> <p>let 18:2 21:15 22:13 41:15 48:11 53:16 56:21,22 57:1,4 72:9 78:9 101:19</p> <p>let's 11:16 19:3,9 21:1 22:4 26:2 28:11 50:1 51:22, 24 58:7,9 59:7,9 68:5,14 69:5 71:3,8 73:9 84:9 86:3,13 87:17,18 91:6,7,15 92:14 93:14,15 101:20</p> <p>lethal 65:10</p> <p>letter 33:18</p> <p>letterhead 33:18</p> <p>letting 57:16</p> <p>level 13:17 14:3 15:15 41:23 81:24</p> <p>license 27:1</p> <p>lieutenant 8:21,24 9:1 12:20,21,23,25 13:2,15,16 15:20 49:20 54:6 55:16, 18 58:12 83:17</p> <p>lieutenants 13:9,10 15:16,18</p>	<p>life 37:19</p> <p>like 4:21 7:25 10:21 11:13 13:23 14:7 15:3 16:24 17:2,22 22:10 23:6 24:14 25:7,20 26:25 27:23 28:17 33:24 35:5 37:13,18 39:22 43:3 44:6,7, 21 45:12 50:7 54:9 59:10 61:10 63:21 66:5 76:10 79:13 81:19 85:3 87:21 93:9 96:23 97:21 100:21 101:12 105:3,12 107:8,16 108:5 109:11 113:14</p> <p>likelihood 109:23 110:1</p> <p>line 15:7 27:19 45:12 103:1</p> <p>listed 50:6,19</p> <p>listened 48:24 52:11</p> <p>little 6:25 7:21 11:16 12:10 19:4 24:15 37:2 42:20, 22 52:22 66:3 69:5 75:22 76:10 98:12 104:14 107:5</p> <p>live 28:21 62:7</p> <p>lived 20:4,10 24:11 100:24</p> <p>locked 107:12</p> <p>long 6:20 7:10,18 8:14 9:17 14:12 22:10 35:24 36:2 42:9,14,16,23 43:2 45:1 53:21 76:4</p>	<p>97:12,14 99:24 102:7</p> <p>longer 7:18 42:20 44:5 58:15 73:15, 17 76:2 102:7 111:16</p> <p>look 15:1 17:21 22:10 38:4 39:3 40:15 45:5,14 65:20</p> <p>looked 17:12,19 21:8 45:1 104:21 107:12</p> <p>looking 65:18 71:4 76:22 95:25</p> <p>looks 17:22 66:5 97:21</p> <p>loose 50:8</p> <p>lose 10:10,11</p> <p>loss 70:13</p> <p>lost 10:12 63:12 65:25</p> <p>lot 32:14,15,18 39:14 42:21 104:14 106:9,10</p> <p>Louisburg 18:25</p> <p>lower 13:17</p> <p>lowering 95:4</p> <p>lowest 14:3</p> <p>lunch 67:1 76:3 107:20</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>ma'am 4:14 11:15 18:21 19:8,24 22:22,25 31:11 46:18 48:4 65:17</p>
---	--	--	---

74:16 75:9 80:9 82:7 83:1 84:7 85:18,21 86:18 87:2,15,23 88:1,8 89:13,16,19,21 90:13,22 91:2,12 93:1,4,20 94:7,18 95:11,18 97:7 100:5 101:25 102:5,25 104:6,13 105:9,19 106:13,18 109:10 111:23 112:11,21 113:6,7, 21,23 mace 47:6 59:24 63:21 68:25 69:18, 19,23 108:8 made 11:3,7 17:8 29:2,6,13 62:14 63:18 77:16 82:5 101:1 103:19 111:6 major 5:25 majority 61:4 make 11:8 12:14 16:10,13 17:19 35:19,21 41:16 43:19,22,23 51:15 53:9,11 54:11 56:7 60:21 101:19 108:23 111:22 makes 69:16 making 32:23 mandate 75:12 maneuver 53:18,19 69:3,7,9,13 manner 62:10 Manual 45:9 many 12:10 27:21 28:1 31:15 32:6,9, 22 60:25 61:2,7	62:22,25 63:2 72:22,23 82:9 94:16,19 104:25 105:14 106:14 March 5:9 mark 20:22 21:1,11 46:4,6,8 86:13 89:2,3 marked 20:24 21:4 46:1,11 48:13,14 66:19 68:14 84:3 86:14 89:7,12 90:24 92:14 marking 66:17 Martin 23:11 master's 6:4 matter 33:1 may 12:3 13:18,21, 25 14:9,13,20,24, 25 15:7,8,9,12 24:12,18 25:4 26:19 41:16,18,19 42:5 49:14 79:16 98:7 maybe 12:10,20 27:24 30:15 76:23 101:9 Mcgurl 4:10 me 4:21 5:10,19 6:8 13:7,11 17:4 18:23 21:15 29:9 31:12 32:3,17 34:16,17 35:21 37:10,18 40:12,18 41:1,3 43:4 44:19 48:19 52:2,9 53:20 54:9, 12,21,22 55:11,12 56:4 58:18 60:4,9 61:25 62:25 63:16 71:7,21 72:6,9,22	73:2,4 74:1,8,24 77:1,7 78:9 79:4 81:4,10,11 82:3,17 84:23 86:19 88:16, 22 89:25 91:18 96:18 101:6,7,19 102:21 103:1,10, 19,22 104:17 105:2 106:4,5,6,8,20 107:24 108:11 109:13 111:9 mean 8:23 9:12 13:16 32:21 37:11 38:14,15 43:8 47:4, 5 50:23 54:21 74:4, 6 81:25 82:15 86:25 88:15,16,17 99:4,6 101:7 103:24 104:1 106:1 110:18 means 38:17 92:7,8 measure 65:15 medications 5:2 meet 62:14 meeting 43:11 54:13 member 109:3,4 memory 42:17,23 43:2 44:25 61:6 63:13 65:20 80:21, 22 93:15,16 94:2,6, 12 104:18 106:19 mental 7:25 mentioned 7:19 40:10,11 49:17 97:18 113:25 mercy 26:20 Merrimack 23:11 met 63:1 79:6	methods 67:18 Michael 4:10 18:17 20:21 21:25 45:2 47:16 66:22 71:4 78:3 84:1 86:9 87:17 90:16 91:8 might 7:17 12:25 13:1,2 16:16 20:8,9 24:12,14,24 25:1,7 28:7,14,19 38:5 52:16,21 54:5 76:13 89:9 102:15 103:23,24 mind 9:8 24:17 36:21 46:19 67:22 68:20 70:11 77:9 81:1 94:22 96:14 111:19,21 minimum 7:17 27:22 28:2,9,11,20 101:9 minute 47:19 86:12 107:11 minutes 21:8 107:7 misdemeanor 79:14 misplace 10:10,11 misplaced 10:12 mobile 107:8,9 moment 45:5 84:8 money 10:18 months 7:17 more 14:10 16:24 19:4 23:24 24:20 28:15 35:16 37:2 39:14 57:13 68:5 84:10 93:7 101:5,7, 18 103:11
--	---	--	--

<p>morning 4:7 77:19, 20</p> <p>mornings 39:2</p> <p>most 64:16 98:4 100:3,5,19 103:9</p> <p>move 22:11 40:7</p> <p>moving 28:25 69:2</p> <p>Mr 4:7,18,19,23,24 16:25 17:1 18:6,15 19:6,22 20:7,24 21:2,6,7,16,21,22 22:6,12 24:3,20 26:9,13,24 27:18, 20 28:1,25 29:16, 20 30:10,18 31:1,7 32:4 35:6,8 36:10, 11,14 37:4,18,20, 23 45:14 46:1,3,8, 12 47:14,24 48:2 49:15,19 50:6,18, 21 51:1,3,6,9,19,24 54:1,20,22,24 55:5, 9,18 56:11,14 59:22 60:16,20,23 61:18,20 63:1 66:14,15,25 67:2,4 76:7,16,18,20 77:4, 8 86:5 87:18,21 89:1,3,4,5,11 90:10 92:18,21 101:14,24 102:20 109:15 113:14</p> <p>Ms 4:6 18:17,19 19:3,5,12,13 20:21 21:1,5,12,18,20,25 22:2,4,7 36:25 37:24 45:2,4 46:2, 5,10,15 47:16,18, 21 48:1,11,15,23 49:1,3,21 55:15 56:15 60:20,23 66:17,20,22 67:3,6</p>	<p>71:3,10 76:6,19,21 78:3,5 84:4,9,12 86:3,8,16 87:17,20 89:1,4,8 90:9,16, 20,23,25 91:8,9 92:16,21 94:11 101:15,17,23 113:8,13</p> <p>much 76:2 102:7, 22,24 112:2,5</p> <p>multiple 74:6</p> <p>multiple-officer 67:15</p> <p>murder 39:8 96:1,3, 7,8 112:22,23</p> <p>murdered 112:14 113:1</p> <p>must 85:7,14 109:3,9</p> <p>my 4:9 6:4,21 7:13 9:5,6 21:8 33:13 35:3,11,23 36:9,21 38:2 41:19 44:18 48:7,8 52:9 54:18 55:2,5,6,18 56:6 57:3 63:13 65:19 66:2 73:16,23 74:20 77:9,10 80:21,22 81:1 84:20 88:13 94:12 98:16,17,25 100:10 103:1,4 104:18,23, 24 106:6,18 107:3, 10,17 109:12 110:5 113:15</p> <p>myself 4:9 12:20</p>	<p>named 36:12</p> <p>names 13:3</p> <p>naming 66:5</p> <p>nature 16:11 104:12</p> <p>NCGS 4:2</p> <p>NCIC 26:16</p> <p>necessarily 27:11 40:23 64:20 76:24 82:14,15 92:2</p> <p>necessary 27:10 40:18</p> <p>need 17:25 21:14 22:6 26:21 28:7 46:13 89:9 109:14</p> <p>needed 44:5 58:15 109:20 111:16</p> <p>neighboring 96:2</p> <p>never 10:11,24,25 11:3,6,7,8 69:22 81:25 83:25 93:20, 23 105:22,24</p> <p>new 5:15 6:12 13:24 23:12,13</p> <p>Newark 6:12</p> <p>next 8:7 14:15 19:3 24:22 26:9 41:22 49:12 53:13 68:20, 21</p> <p>night 38:6 53:13</p> <p>no 4:17,20 7:16 10:1,11 20:19 26:6 27:11 28:22,23 30:8 31:3 32:8,13, 22 33:21 35:3,11 40:23 42:11 43:13 44:5,18 45:13 50:9 54:3,17 56:4 58:14</p>	<p>59:19 62:20 64:6 69:15 71:21 72:2 73:15,17,21,23 76:3 77:5,6,10 81:10,14,16 82:11, 12 83:1,25 85:21 86:9 87:23,24 88:1, 3,5,8,25 93:1,20 94:3,7 95:21,23 96:5 102:5,20,25 103:23 104:13 105:16,19 108:24 109:1,2,10,17 111:16 112:10,12, 21,24</p> <p>nodded 23:23 45:23</p> <p>nominal 103:3</p> <p>None 94:4,5</p> <p>nonsupervisory 15:3</p> <p>nonsuspect 80:18</p> <p>nonsuspects 80:16</p> <p>nonviolent 93:10</p> <p>north 5:11,12,18,24 6:7 20:8,11 23:11, 16,17,18,19,20,21 106:22</p> <p>not 4:7 7:10 8:22, 23 12:15 13:13,19 14:14 15:2,12 16:1, 16 21:22,23 24:24 25:1 26:19 27:11, 22 28:1,7 29:14,17, 18,23 30:8,23,24 31:3,5,6,17 32:11, 14 33:6,20,21 35:6, 11,20 36:7 38:5 39:22 40:3,23 42:25 51:16,18,20 53:10 54:18,19</p>
--	---	--	--

58:5 60:3,16 61:8 62:4 64:20,21 69:14,23 70:13 71:4,12,25 72:2 77:6,11 81:7,10,15 82:14,15 84:14,17 85:18,21 86:9 87:8 88:1,3,5 89:20 90:3 93:10 96:7 100:14, 16 107:10 111:20 112:6 note 101:19 noted 10:17,18 51:16,18 notes 52:13,15,18, 20 nothing 13:14 76:20 78:11 106:5 now 9:8 24:17,20 44:25 47:13 67:23 68:10,13 70:11 73:17 75:16 76:3, 18 84:21 89:24 90:11 94:22 101:12 102:15 110:12 111:20,21 number 15:19 20:22,25 21:2 32:12,17,21 38:11, 24 43:5 46:2,12 66:16,18 68:15 71:1,2,9 74:16 86:13 104:10,25 105:11,20 109:8 112:5 numbers 38:22 <hr/> O <hr/> obeying 107:10 object 101:15	Objection 37:23 obligations 9:9 obtained 48:22,23 85:6,12 obtaining 24:3 85:14 OC 46:21,24 occasion 100:18 occasions 74:2 98:5 108:13 occurred 49:12 52:8,25 73:3 75:7 86:21 106:24 of 4:17 5:2,14,19 6:12 7:5,10,13,17 8:2,10,12,19,20,22, 23 9:9,13,16 10:16 11:6 12:1,23 13:3, 12,22 14:2,3,6,8, 12,13 15:1,15,16, 19 16:9,10,15,17 17:7 20:3,5,8,11,14 22:4,17 23:3,5 25:6,10,13,23 26:15,20,21,25 27:7,10,12,13,14, 21,22 28:2,6,9,10, 11,20 30:20,21 32:5,14,20,22 33:1, 4,23 34:8 35:1,2, 16,21 37:3,4,9,17, 19 38:7,25 39:11, 18,21,24,25 40:3,6, 11,17 41:14,23 42:1,8,16,17,23 43:2,5 44:9,10 45:8,16,18,25 46:13,20,23,24,25 47:3,11,14 48:7,9 49:7 50:2,4,15,23 51:20 52:10 54:11,	16 55:9,12,13 56:6, 8,25 57:3 58:11 59:7 60:4,12 61:4,7 62:7,15,16 63:13, 17,23 65:4,5,15,25 66:14 67:18 68:17 69:4,21,23 70:8,10, 11,13,14,23 71:11, 16 72:19,23 73:5, 23 74:8,10,11,19, 25 75:2,11 76:4,9, 11,13,14 77:4,7,20, 23,24 78:12,15 79:5 80:1,10,12,13, 18 81:1,9,12,24 82:18,20,25 83:7,9, 13,18,19,22 84:6, 21,25 85:7,8,25 86:19,22 87:5,6,21 88:13,19,21,24 89:14,23 91:14,15, 25 92:4,6,7,9,11,12 93:4,5,13 94:1 95:9 96:3,12,16 97:2,4, 15,21 98:4,5,16,22 99:8,9 100:2,10,11, 21,23 101:9 102:11 103:1,9 104:10,12 105:4,10,11,12,13, 20 107:1,5,10,24 108:3,4,6,10,21 109:3,4,8,11,25 110:2,11,19 111:6, 12,15,18 112:14 113:1 off 11:6 53:6 67:11 74:8 76:7 79:16 101:20,21 102:1 107:13,23 113:10 off-the-record 90:8 offer 13:20 office 6:17 8:5 9:14 11:2,18 13:12	25:11 26:15 32:21 41:19 45:9 47:7 52:9 53:7 54:18,20, 21,22 55:2,6,18 58:14 66:8,11 71:25 72:10 75:8, 10 78:6 85:10,12 87:14 88:17,19,23, 25 103:2,3,4 105:15,22,25 106:1 office's 34:3 officer 6:9 13:25 17:14 27:2 28:11, 15 41:14 42:5,7 43:16,17 44:7 58:13 64:19 67:25 68:8,12 75:13,17 81:1,22 83:5,18 86:22 87:9,13 91:16,21,23 98:8 100:22 101:10 103:12 104:6 107:21 108:2,8 109:9 111:11,12 112:2,5,6,7,9,12, 15,18,23 113:1,2 officer's 104:20 officer-involved 97:22 100:12 officers 10:17 32:10 38:10 41:4 42:19,21 60:2 75:11,19 94:16 96:16 98:6,9 100:11 103:20 108:4,6,7,11,12 offices 9:13 officially 14:14 often 80:22 oh 36:12,16 44:15 45:15,16 76:20
--	---	--	---

86:11 94:18,21 102:10 105:16 106:3,6,18 okay 4:8,15,25 5:5, 10,12,25 6:6,8,18 7:2,5,14,19 8:4,9, 14 9:9,17,22 10:4,7 11:13,16,21,24 16:24 17:18 18:2,3, 4,5,7,10,15,17 19:9 20:20 21:13 22:15, 16,17,18,19 23:16 26:2,8 27:8,20 28:25 29:9,15 30:2, 13 31:4,12 33:17, 22 34:5,7 35:6,19, 24 36:6,16 37:1 38:9 39:16,18 40:8, 10 41:4,11,22 42:13 43:19 44:20 45:6,7,10,18 46:3, 14 47:3,10,15,24 48:5,11,19 49:4,11 50:13,18,25 51:22 52:7 54:23 55:24 56:17 57:10,12,23 58:16,18 59:3,13, 21 60:4,15 61:13 63:3,6,10,16 64:9, 13,21 65:9,22 66:7, 12,14,25 67:3,5,7 68:5,19 69:5,12,16 70:5,17,24 72:5,9, 14,18 73:9 74:21, 25 77:3,6,12,19 78:2,9,13,14,17 79:9 80:4 81:5 83:12,22 84:1,11, 13,20,24 85:2 86:15 87:16 88:9 90:14,19 91:6,15 92:14,17 93:12,14, 25 94:13,21 95:14, 24 96:9 97:24	99:12,20 100:14 102:11,13,14,18,19 103:7 104:10 105:2,5 106:21 108:15,22 109:18, 21 113:24 old 80:25 Oleoresin 46:20 Oliver 48:10,23 49:1,3,21 55:15 56:15 60:20,23 68:24 69:1 92:21 94:11 Oliver's 92:16 on 6:4 7:13 9:14 10:1,17 12:7 14:5, 18,19 15:7,19,22 18:13 19:14 22:23 24:15,21 25:5 27:14,25 28:25 29:6,23 32:21,25 33:18 34:16,18 35:12,13,17 36:4 37:2 38:5,19,21 39:1 40:15,17,24 41:15,18 42:11,18 44:16,18 45:25 46:12 47:23 48:8 49:7 50:5,15 51:6, 10,12,14,16 52:5, 12 53:3,14,15,17 55:5 56:8 58:21 60:3,13,17 61:5 63:23 64:11 65:5 67:11 68:2 71:5,16 73:7,25 74:17,20, 23 75:11,19 77:10, 13,14 78:10 79:15, 22,25 84:22 85:24 87:13 90:10,11 91:3,18 93:9 96:7 98:5,6,17 100:19 101:2 103:25	104:16,17,21,25 106:5,22 107:2,3, 21 108:21,25 110:5,19 112:5,21 on-the-job 99:1 once 7:12 8:19 11:11 12:13 14:4 17:7,9 25:16 29:21 35:11,14 54:25 55:21 67:1 83:17 one 10:16 11:11 12:10,23 16:9 17:4, 6,12,13,16 27:22, 23 28:2,9,11,14,20 32:9 33:4 37:3 56:15 67:14,15,16 68:1 73:5 74:19 78:21 86:22 94:10 95:5,14 96:14,16, 19 97:2 99:17,19 101:4,5,8,18 103:9, 11 106:8 107:1,14 108:1 111:18,19,20 ones 14:5 104:24 ongoing 26:22 online 12:3 only 47:6 63:6,8 80:18 92:1 94:9 98:16 99:17 108:17 111:18,19,20 opened 10:20 opening 25:20 operate 43:9 operating 57:3 operation 38:21 opinion 12:15 59:21 opportunity 48:2	options 68:22,23 or 4:12,17 6:9 7:15 8:22 9:13,20 10:10, 11,12 12:3,15,20, 25 13:10,16,23,24 15:2,12 16:14 17:3 20:4,10 21:9,22,23 23:3 26:4,19 27:23 29:5,11,14,23 30:23,24 32:5,10 34:14 35:2,13 40:13 42:5 43:1 44:13 46:25 47:4 51:6,13,23 52:23 53:8,12,13 54:5,13, 18,19 55:6,25 59:8, 25 60:1 61:5 64:17 65:2 68:7 69:10,19 77:13,23 79:14 80:7,25 82:16 85:13 92:1,2,5,7,8, 9,11 93:8 95:19 97:20 98:3 99:24 101:1 103:15 104:11,12 105:25 106:1,8,15 107:7 108:10,11 110:1 111:9 oranges 110:10 order 49:22 51:14 66:6 83:6 85:7,9 other 24:4 25:6 33:7 46:24 61:14 63:21 68:1,22,23 70:12 87:10,12 92:8 93:16 95:24 98:6,19 100:11 103:2,20 106:15,16 107:13 108:12 others 24:18 92:10 our 12:14,15 23:3 29:21 62:14 69:10
---	---	--	--

<p>96:2</p> <p>out 6:12 8:19,20 10:23 14:4 17:2 23:3,7 24:2 27:15 36:20,21 38:5,25 39:24,25 40:6 42:5 47:11 53:6 57:21 61:24 62:7 63:13 74:10,11 79:13,17 86:22,24 90:6 95:2 96:12 97:2 102:11 107:2,6,13 108:3,4, 10 111:12</p> <p>outcome 57:19 95:9,12</p> <p>outcomes 108:18</p> <p>outside 20:8,11 55:9 78:12 104:23</p> <p>over 9:2,3,11 10:8 11:3 12:19,25 13:6 14:8 15:11 16:9 22:10 24:10 34:19, 20 38:3,7,8 40:7 45:5 56:23 63:12 66:4 70:15 74:13 83:15,20 89:9 96:16 98:20 107:5</p> <p>Owl 5:11</p> <p>own 7:13 35:3 97:19 113:15</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 76:5 101:22 113:12</p> <p>page 18:6 19:14 22:4 45:25 50:1,4,9 66:14,21,22 67:11 85:1</p> <p>pages 84:25</p>	<p>panel 12:12,16,17 17:5 26:3,4,7 27:8, 9,17,20 28:3,14 29:12,21,25 30:7,8, 10,13,17,20,21 31:1,4 36:19 43:10, 13 100:21</p> <p>panels 32:25 37:3</p> <p>panic 70:15</p> <p>papers 8:2,3 14:6 37:15</p> <p>paperwork 35:15</p> <p>part 20:14 33:23 40:3 56:6 57:3 73:23 100:3,5,10, 19 109:3</p> <p>partially 106:25</p> <p>participating 4:11</p> <p>particular 13:15 24:16 25:17 28:15, 24 32:9 33:13 36:15 37:5 38:11, 12 42:4,8 44:6 83:16,21 96:7 103:19</p> <p>Pasquotank 23:19</p> <p>passing 103:3</p> <p>patients 7:25</p> <p>patrol 6:23 7:21 8:6 14:19 15:17,23 17:10 100:22</p> <p>patrolman 106:23</p> <p>pay 15:1 44:4</p> <p>payroll 87:14</p> <p>pen 46:13</p> <p>people 12:22 13:7 16:9 24:14 25:9,13,</p>	<p>19 28:16,20 42:20, 21 60:3 61:9,10 73:4 74:3,5,17,20 79:20,23 82:4 83:15 86:19 93:8 101:9 105:14,21 106:2,3 108:14</p> <p>people's 24:10</p> <p>pepper 63:21 64:24 65:11,16 69:19,21 70:7,9 73:25 74:3</p> <p>pepper-sprayed 73:4</p> <p>per 109:11</p> <p>perfectly 21:9</p> <p>perform 28:3 60:16</p> <p>performed 13:7 24:21 53:17,20</p> <p>period 5:14 14:4 25:5</p> <p>permits 37:14</p> <p>Perquimans 23:20</p> <p>person 9:15 13:18, 20,21,25 34:18 36:15 42:6 54:1,4 60:11 68:2 91:24 92:3,6,11 93:5 95:4,16 97:8 103:10 105:3 106:6 107:7,21,24 108:11 112:14</p> <p>person's 40:16 41:12</p> <p>personal 35:3 70:23 88:23</p> <p>personally 83:24, 25</p> <p>personnel 89:6</p>	<p>persons 61:14 63:6,8</p> <p>pertaining 48:9</p> <p>phase 7:10,12 25:10</p> <p>phone 54:13 55:6</p> <p>phrased 72:6</p> <p>physical 91:24 92:4,10</p> <p>pick 82:16</p> <p>Pitt 23:20</p> <p>place 28:13 43:1 65:4 80:25 81:2</p> <p>placed 112:19</p> <p>places 20:10</p> <p>placing 65:2</p> <p>Plaintiff 4:18</p> <p>played 77:10</p> <p>plays 113:4</p> <p>please 21:15 37:25 47:20 58:8,9 85:1 90:14,16</p> <p>pleasure 110:2,11</p> <p>point 11:2 13:1 24:24 25:2,3,24 26:1 27:5 35:25 36:3 49:24 52:10 54:17 55:1,2,3 85:4</p> <p>pointed 57:21</p> <p>pointing 95:5</p> <p>poked 103:5</p> <p>police 6:9 28:17 36:18</p> <p>policies 72:15,16 76:14</p>
--	--	--	--

<p>policy 35:1,2 44:24 45:3,8,9,11,19,22, 25 47:2,11 58:22, 25 59:14,20 66:13 67:7,8,9 69:3,7,10, 13,17 70:25 71:8 84:5,8,13 89:18 91:10 92:24 97:24</p> <p>poor 25:1</p> <p>portfolio 36:22</p> <p>portion 90:2,3,4,5 91:13</p> <p>position 6:18 8:15 9:6,18,23 10:9 15:25 16:6</p> <p>positions 31:15</p> <p>possible 78:11</p> <p>posted 82:7</p> <p>potential 18:13</p> <p>practice 54:10 81:25 97:25 98:1 109:6,7</p> <p>pre-employment 12:6</p> <p>prepared 5:1 85:8</p> <p>presence 55:5,9 63:19 64:23</p> <p>present 54:21</p> <p>presents 92:9</p> <p>president 31:24</p> <p>presiding 85:8</p> <p>pretend 13:13</p> <p>pretty 20:15 74:21</p> <p>prevent 92:5,11 93:4</p> <p>previous 31:15</p>	<p>previously 27:2</p> <p>primarily 9:25 13:9, 10 14:5</p> <p>prior 46:20 68:24 85:13</p> <p>prison 93:9</p> <p>probably 6:15 14:2 37:3 39:14 77:19 81:20</p> <p>problem 88:9,13, 21,25</p> <p>procedure 57:3</p> <p>procedures 72:15, 17</p> <p>proceedings 21:19 47:25 76:5 101:22 113:12</p> <p>process 11:17,20 12:1,13 17:1 24:22 27:7 29:10 33:4,5, 12,23 34:6,7,8 41:11 44:10 48:19 79:5 97:21</p> <p>processed 49:13</p> <p>produce 51:15</p> <p>progressively 44:14</p> <p>promoted 7:1 8:6, 8,11,21 13:1 14:14, 21</p> <p>promotion 6:21 14:23 15:2</p> <p>proof 47:8</p> <p>prospects 24:8</p> <p>provide 26:24</p> <p>provided 77:16 103:15</p>	<p>public 10:23</p> <p>pull 17:18 20:5,21 21:25 58:8 66:12 70:24 71:8 86:3 87:17,18 89:1,10</p> <p>pulled 45:3 84:1</p> <p>pulling 107:8</p> <p>purpose 30:20,21 80:2 91:25</p> <p>purposes 4:17 23:5 80:3</p> <p>Pursuant 4:2</p> <p>push 74:8</p> <p>put 22:17 27:15 31:18 32:21 46:12 53:15 60:13 64:11 74:16,18,20,23 81:25 107:2,3 108:2 112:4</p> <p>putting 33:10</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualification 91:14</p> <p>qualified 25:23 88:18</p> <p>qualify 25:8</p> <p>quantitative 112:4</p> <p>quarter 67:16</p> <p>question 19:10 30:16 37:25 38:1 39:20,22 50:13,14 51:4 65:12 68:6 72:3,9 77:12 80:11 84:20 102:16 108:17 109:24 110:3,9</p>	<p>questions 4:17 18:8 23:25 24:5,9 50:3 78:4 84:22 102:4 113:15</p> <p>quick 66:23 67:13</p> <p>quite 8:22,23</p> <p>quote 51:20 63:13, 16 76:15</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raids 79:22,24</p> <p>ran 26:4,6,8 27:16 53:4</p> <p>range 90:6,7 104:3 110:18,19</p> <p>rank 13:3</p> <p>ranks 13:18</p> <p>rape 39:10</p> <p>rare 100:18</p> <p>rate 97:4 107:9</p> <p>reach 23:3</p> <p>reached 23:7 58:19</p> <p>reaching 24:2</p> <p>reaction 70:6,9</p> <p>read 18:23,25 19:14 22:6 23:9 45:7,12 58:7,9 85:3 90:14 91:6,7,15,20 92:24 93:2</p> <p>reading 46:19 68:20</p> <p>reads 57:22</p> <p>ready 25:15 67:4,5</p> <p>realized 53:7</p>
--	--	--	---

really 27:24 36:22 102:14 reason 18:22 19:1 28:23 31:16 36:20 96:21 111:12 reasonably 92:1,3, 6 reasons 28:8,21 recall 24:19 26:10, 11,12 27:20 28:1 34:9 35:8,9,18 48:16 49:4,18,19 53:22 55:7,10,11 56:20 57:14,15,16, 17 62:16,19,20 67:24 68:7,10,13 71:14,17,18 77:22 79:22 80:13 81:5 94:22 97:13 99:20 100:20 104:10 106:17 receive 46:21 received 10:25 11:1 27:10 recently 16:5 recess 21:19 47:25 76:5 101:22 113:12 recognize 22:20 63:14,15 91:1 recommend 29:10 30:8,10,14,23 31:1 59:8,12,13 recommendation 29:2,3,6,13,15,22 31:13,18 35:20,23 36:8,9 43:20,22,23 44:1,13,15,18 51:15 55:23 57:6,8, 21,22 58:8,10,11, 19 77:11 110:4,5	111:22 recommendations 12:14 16:14,16,17, 22 29:21 recommended 29:1,4,7,16,20 30:7,18 31:5,6,17 32:10,11,14,15 35:7 36:18,19 58:3 67:25 68:8,11 record 5:6 20:2,13 23:5 24:3,4 38:12, 13 48:11 76:4 78:10 87:19 89:6, 14 101:20,21 102:2 113:11 recordings 48:25 records 9:2 20:5 37:13,14 83:12,18, 19 recruited 6:11 refer 4:18,22 14:9 referred 86:18 referring 33:24 50:7 56:1 67:12 86:7 96:19 refill 47:22 reflect 48:11 refused 74:10 registration 53:4 release 79:19 released 79:7 Relevance 37:23 relevant 43:17 relied 77:13,14 rely 98:6	remain 87:13 remember 10:16,22 11:5 12:18,24 17:22 24:9 32:7,8 52:17,23,24 54:8, 12,14,15 55:13,14, 15,16,17,19,21,24 56:4,5,13,14,16 58:1 80:23 94:10 99:17,19,25 104:5 112:1 remotely 4:3 repeat 4:8 86:1 88:20 report 16:3 38:9,16, 18,24 39:5,9,10,11, 12,13,19 40:1,9,10 41:4,8,9,10 43:6 44:8,9 47:17 48:21, 22 50:2,4,23,24 51:7,15 52:3 54:9 55:14,20,22 57:11 64:5,8,12,16,18 68:15,17 70:2 73:23 75:4 77:25 110:20,24 111:2,4, 5 113:17 reported 47:1 reporter 4:16 90:4, 8 reporting 73:24 reports 38:3,7,8,10, 19,20,21 39:2 40:14,21 49:22 51:7 77:13,21 reprimanded 87:9, 12 request 20:3,9 26:15 34:20 100:6, 8,13,17	requester 34:21 requesting 33:22 requests 23:4 require 60:18 required 38:18 39:5 41:4 47:1 requirement 89:23 110:20,24 resided 5:12 resist 74:4 resisted 74:3 resolved 42:10 respond 24:15 109:5 response 19:17 responses 102:4 responsibility 14:2, 3 78:22 responsible 11:11 25:11 37:13 83:14 restroom 76:1 result 75:1 82:9 92:12 93:5 107:24 108:10 retired 9:21 11:20 16:5,6 65:24 returned 96:12 review 17:11,24 26:4,7 45:24 46:16 47:19 48:3 84:21 86:12 89:11 90:15, 17 108:24,25 109:1 113:9 reviewed 19:21 84:16
--	---	--	---

reviewing 24:4 47:21	14:12,13	16:12 19:6 20:12, 15,17,18 27:8,12 28:11,12 29:23,25 30:1 31:22 33:17 34:17 37:21 41:20 44:7 45:21 46:7 51:17,20 52:25 55:8 56:1 57:5,23 59:19 62:11 64:15 69:12 70:17 78:12 79:18 80:6 82:17 94:9,18 101:16 104:14 106:3,6,15 109:19 110:23 112:3	sealed 10:17,19,20
rewind 26:2	room 9:16 11:4 107:20		search 80:24,25
ride 7:11	rose 41:23		second 46:19 67:14 71:7 89:9
right 8:24 9:8 16:17,22 18:18 21:12 24:17 30:19, 25 34:2,18 36:16, 23 38:15 40:2 50:11,12 58:16 59:7 66:23 67:22 68:10,13 70:11 71:5,6 75:17 88:2 94:20,22 101:12,13 102:18 106:10 111:20,21	roundabout 32:17		section 45:25
	rule 58:22		security 25:12 27:1
	run 20:1 34:10 64:14,16 79:16 96:16,25		see 17:14 18:20,22 22:3,17 26:14 33:2, 13 35:12 38:23 39:23 45:15 50:6, 18 59:20 63:15 64:7,10 66:23 90:18 93:15 113:10
	running 96:25 97:1		
	runs 14:17		
	<hr/> S <hr/>		
	safe 27:8,12 45:21	saying 10:8 29:7 30:25 49:2 52:21 62:5 71:17,18,24 72:2 73:10 77:2 78:10 109:3 111:20	seeing 103:2
right-hand 45:14, 15	said 4:8 9:11 19:22 21:23 31:22,24 33:10 36:6 37:6 41:11 50:8 51:21, 23 53:16,17 55:10, 24,25 56:4,5,9,10, 17 57:14,24 59:19 60:20,23 61:2,25 62:2,3 64:23 68:19 69:18 71:23 72:4,7, 18 79:9 84:17 88:20 93:18,20,21, 23 94:21 96:5 99:2 101:18 107:22,23 112:22 113:18	says 18:20,22 50:9 68:21 91:16,20	seek 6:2 103:14
rights 21:10		SBI 97:16,20,22 100:13	seeking 34:8
rise 81:23,24 82:3		scare 105:3	seem 69:16
road 6:23 39:23,24, 25 40:4,7 106:24		scared 105:4	seemed 53:14
Robinson 4:6,9 18:17,19 19:3,5,12, 13 20:21 21:1,5,12, 18,20,25 22:2,4,7 36:25 37:24 45:2,4 46:2,5,10,15 47:16, 18,21 48:1,11,15 66:17,20,22 67:3,6 71:3,10 76:6,19,21 78:3,5 84:4,9,12 86:3,8,16 87:17,20 89:1,4,8 90:9,16, 20,23,25 91:8,9 101:15,17,23 113:8,13	same 14:19 15:1,7 22:13 23:14,15 49:9 62:6 93:17	scenario 24:16 113:5,6	seems 50:7
	sat 10:20 17:4 27:15 32:25 37:2 52:9	scenarios 24:15	seen 55:14 64:7
role 37:2,4 94:15 113:4	saw 17:15 53:2 57:20 87:16 97:2	scene 10:23	self-defense 112:25 113:4
roles 8:18 13:15	say 7:14 10:1 14:24	scenes 9:14	self-protection 47:1
		school 5:16,17 6:15 7:7,9 20:4,11 24:11 80:25	send 25:12 29:4 34:17,22
		scope 78:12	senior 5:20 14:10
		screen 22:11 90:10	sent 21:5 29:7
		scroll 17:24,25 18:18 22:13,15 71:3 90:16,17 91:8	sentence 19:14 47:4 68:21 71:7 91:17,22 93:8
			sentences 47:5
			separation 59:9,10, 13 67:25 68:8,11
			September 91:3

<p>sergeant 7:11 14:9, 15,16,25 15:6,9,12, 13,14,21 49:20 54:5 55:17,19 58:12 93:22</p> <p>sergeants 15:18</p> <p>serious 92:9 110:13,17</p> <p>serve 8:1,17 53:8 93:9</p> <p>served 15:25</p> <p>service 25:8 58:14 111:16</p> <p>services 44:5</p> <p>serving 14:6 92:18</p> <p>set 12:8 43:5</p> <p>seven 102:16</p> <p>several 74:2 95:2</p> <p>severity 109:25</p> <p>sex 8:13 10:6</p> <p>sexual 110:12</p> <p>shake 33:8</p> <p>shall 46:21 47:1</p> <p>share 108:18</p> <p>Sharika 4:9</p> <p>Shaw 18:20</p> <p>she 36:23 49:4,5, 10,11,14 53:5,6,14, 16 87:3,4,7 93:2,7, 13 95:23</p> <p>Shearin 12:23 13:3 83:17</p> <p>Shelton 13:4 75:18</p> <p>sheriff 4:19,20 6:19,20,23 7:3,20</p>	<p>11:22 12:14 16:4 17:8,15 26:1 29:4, 11,14,17,18,22 30:11,19 31:3,6,9, 20,22 32:6 33:6,7 35:20,24 36:2,4,5 43:24,25 49:25 55:22 56:18 57:14 63:1 98:7 110:2,11</p> <p>sheriff's 6:9,17 8:5 9:14 11:2,18 12:1 13:12 25:11 33:18 34:3 35:9 38:17 45:9 47:7 58:14 66:8,11 71:25 72:10 75:8,10 78:6 82:25 85:10,12 87:14 88:17,19,23, 25 105:11,15,21,25 106:1 112:18,23 113:1</p> <p>sheriffs 110:7</p> <p>shift 14:8,17,18 15:20,22 24:24,25 25:15,18,19 53:11, 12 76:10 81:21</p> <p>shin 67:11</p> <p>shoot 42:19,21</p> <p>shooting 97:22 100:12</p> <p>shootings 59:4</p> <p>short 10:21</p> <p>shorter 42:22</p> <p>shortly 28:13 99:23</p> <p>shot 95:5,16,17,22 112:18,19,23,24</p> <p>shotgun 95:2,3,4,5</p> <p>should 21:11 29:6 48:12 50:1 111:1,3</p>	<p>112:19</p> <p>shoulder 65:7 97:11</p> <p>shouldn't 59:23 112:24,25</p> <p>showing 89:24</p> <p>shows 22:1 113:17</p> <p>sic 111:5</p> <p>side 14:19 40:7</p> <p>sign 19:15 34:21 91:13</p> <p>signals 107:10</p> <p>signature 22:23 90:11,18,21</p> <p>signed 91:4,5</p> <p>significant 103:24 104:4,7,8,17 106:18</p> <p>simple 41:17</p> <p>simply 64:8</p> <p>simulated 75:23</p> <p>since 9:6 32:13,20 33:15 59:9 62:23, 24 75:6</p> <p>single 12:22 28:23 100:4</p> <p>sir 22:12 86:10</p> <p>sitting 33:5</p> <p>situation 10:15 46:25 74:7 79:12 80:19 88:11 103:12</p> <p>situations 11:13 79:15 108:16</p> <p>size 98:5</p> <p>skim 84:8</p>	<p>slam 60:3,19 69:11</p> <p>slammed 58:20 59:1,23 60:17,20, 23</p> <p>slamming 68:24 69:9,13</p> <p>slight 107:5</p> <p>slow 84:9 107:11</p> <p>slowing 107:4,6</p> <p>small 25:1 28:18</p> <p>snakes 105:4</p> <p>sniff 80:5,7</p> <p>snippets 52:22</p> <p>so 4:15,20,24 5:1,5 6:8,9,22 7:2,19,20 8:4 9:7,11 10:7 11:16,25 12:18,21 13:6,12,17 16:5,8, 24 18:11 19:6,21 20:9,12,22,23 21:14,21 22:4,9,17 24:2 25:8,9,12,17 26:8,18 27:5 28:25 29:9,15,20 30:5,7, 13,22 31:4,15 32:24 33:2,13,15, 17 34:13,20 35:6 36:6 37:1,11,18 40:10,21 41:4,11 42:14,20 43:13 44:6,20,23 45:1,21 46:9 47:11 49:1,11, 18 50:25 51:22 54:23 56:25 57:13 58:3,5,8,16,21 60:25 62:7,9 64:7, 21,22 66:7 67:7 68:3 69:5,25 70:25 71:24 72:18 73:10, 18,25 76:13 77:9</p>
--	---	--	--

78:6,9,15,18 79:9 80:22 81:17 83:22 84:13 85:16 86:21 87:1 89:9 90:10,17 91:10,15,18 92:14 93:14,15,18 97:10 99:2 103:1,2,6,21 104:23 105:10 106:11,12,19 107:1,7,14 108:22 109:2,25 110:15,18 112:18 113:4 social 27:1 soft 63:20 64:22,24 65:1,4,6,8,9 71:12 soft-hand 65:13,14 68:1,3,4,9,12 74:12,19 soliciting 110:12 some 8:2,17 9:20 11:2 13:1 14:24 16:15,17 18:8 20:7 23:24 24:14,23 25:19 26:24 27:5, 12,13 28:20 34:14 37:5 39:23 40:14 47:7,13 48:7 49:24 51:20 54:17 55:1,2 59:7 60:4 71:4 73:9 76:13,14 78:4 80:1 84:9 91:8 99:9 100:11 102:20 111:12 112:6 113:9 somebody 11:6,10 42:25 43:1 49:23 65:5,7 74:7 82:16 112:23 113:1 somebody's 34:11 65:2 95:1 somehow 32:19	someone 12:3 40:25 47:3 59:11 63:18 67:17 70:17 80:15 81:2,17 104:21 112:14 something 11:1,10 32:23 34:2 38:14, 15,18,21 40:25 41:1,17 42:6,21 43:3 53:16 64:8,12, 13 66:23 76:23 83:9 101:16 105:23 Sometime 52:2 sometimes 8:3 12:3 15:13,14 25:2, 12 27:24 28:5,6,16 65:4 70:12 79:25 somewhat 89:19, 21 somewhere 104:2 sorry 36:1 52:19 59:16 67:5 80:6 86:11 88:20 100:7, 15 sort 7:12 40:17 81:1 soup 105:13 speak 11:22 57:13 78:16 speaking 49:18,19, 20 specialist 87:22,25 specialized 8:13 specific 12:16 24:9, 20 79:22 specifically 10:8 16:25 26:11,12 27:18 28:1 57:13	specifics 35:10 83:7 specified 91:25 speed 97:4 107:10 speeding 53:3,5 spoke 54:1,25 55:4, 8 56:10,15 57:12 94:11 103:5 spoken 49:23 spray 46:21,24 47:8 63:21 64:24 65:11,16 69:19,21 70:7,9 73:25 74:3, 11 sprayed 70:22 74:9 108:8 spraying 46:25 staff 15:15 Stainback 13:5 stand 109:12,13,14 standard 54:10 57:3 108:24 109:1, 8 standards 29:5,7, 11,25 34:12 35:2 60:1 stands 36:21 start 23:6 34:9 40:20 41:24 51:24 66:24 91:19 99:10 107:3 started 6:4,16 7:2, 19,20 8:5 9:19 33:4 34:6,24 35:8 95:4 96:25 98:18,21 99:2 100:1 108:5 starting 13:17	15:15 starts 63:19 67:11 state 5:5 14:1 statement 50:6,18, 21 55:14 61:5 90:8 statements 42:4 51:22 77:13,15,16, 17 stay 109:13 staying 58:1 step 14:15 24:22 steps 43:4,5,8 44:12,15 still 11:1 28:14 64:4 stood 36:20 stop 18:18 40:6 107:22,25 stopped 36:5 106:24 107:2,21 stops 79:25 straight 25:21 60:12 stray 80:11 stretch 109:13,20 strike 73:7,11 75:22 striking 73:15 struck 73:18 75:24 structure 13:12 student 91:5 stuff 14:7 17:7 26:19,22 27:5,12, 13 40:6 63:13 Subdivision 91:25
--	--	--	---

<p>subject 42:8 60:4 71:19,25 72:11,19, 23 73:5,14 74:10 75:1,25 76:9 77:24 79:8</p> <p>subjects 79:6,8,10</p> <p>submit 34:12</p> <p>submitting 52:3</p> <p>subpoenas 8:2</p> <p>subsection 92:1 93:3</p> <p>substance 85:9,23</p> <p>substances 85:5, 11,17</p> <p>substantiatable 111:5</p> <p>substantiate 61:4</p> <p>substantiated 61:7, 10 111:4</p> <p>substitute 71:12</p> <p>succumbed 105:12</p> <p>such 59:25 65:10, 15 82:2</p> <p>sue 105:15,17,21, 23,25 106:1,4,6,9, 10,11 107:15</p> <p>sued 62:12 105:20 106:12 107:24 108:1,11,14</p> <p>suing 62:1</p> <p>suit 61:24 62:23,24 82:18 105:12</p> <p>suits 82:9</p> <p>summarize 53:1</p> <p>supervise 15:18</p>	<p>supervised 15:19, 21</p> <p>supervises 14:18</p> <p>supervising 15:13 81:22</p> <p>supervision 98:22</p> <p>supervisor 8:18 14:14,16 15:5 40:17 41:12,15,16 43:12 54:10 104:20,22 110:23</p> <p>supervisors 49:16 56:7 110:20,24</p> <p>supply 80:25</p> <p>Supreme 76:15</p> <p>sure 7:10 8:22,23 17:19 41:16 49:24 54:11 56:7 108:23</p> <p>surprised 85:19,21</p> <p>suspect 85:20,22 108:2,3,4</p> <p>suspect's 61:5</p> <p>suspects 80:12 82:5,8 96:1</p> <p>suspend 44:4</p> <p>sway 106:8</p> <p>swear 29:23</p> <p>sweep 60:7</p> <p>Swilley 83:18</p> <p>switched 6:24</p> <p>sworn 4:3 13:25 24:23 25:25 26:1 27:2</p> <p>system 6:15 93:9</p>	<p>T</p> <p>take 14:5 17:21 21:14,16 25:8 35:20,22 36:8,9 40:15 42:10,16,23 43:3,5 45:5 47:19 52:13 67:1 79:7 84:8 86:12 95:1 97:12 99:16 102:8 109:15 113:8</p> <p>takedown 53:18,19 60:6 67:16 69:2 75:25</p> <p>taken 10:22 79:15, 21</p> <p>takes 42:20 67:13 75:14</p> <p>taking 35:3 55:21, 22 79:5</p> <p>talk 16:24 24:12,13 32:6 36:14 42:5,7 43:16 47:13 58:1 59:7 62:13 75:4 93:14 98:12</p> <p>talked 31:21 43:11 49:14,15,24 62:3,4 64:21 66:8 77:12, 20 83:22 93:21,22, 25 113:16,25</p> <p>talking 33:18 46:9 51:13 54:18,20 55:15,16,17,18 57:7,20 82:16 86:9 94:23 103:7</p> <p>tally 32:19 61:12</p> <p>tapes 48:24</p> <p>Tasers 65:11,15</p> <p>team 16:3</p>	<p>tease 69:5</p> <p>technique 60:1,10, 16,18 65:14 67:10 68:1,3,4,9,12 71:13</p> <p>techniques 60:5 63:21 65:13 71:19 72:11 74:12 75:20, 21,25</p> <p>telephone 41:17</p> <p>tell 5:10,19 6:8 26:11 27:18 29:9 31:12 40:12 42:14 43:4 44:5 53:20 54:7 55:11 57:7 60:4 67:8 74:1 76:16 96:18 101:7 111:9</p> <p>telling 103:10,22</p> <p>ten-minute 21:17 109:16</p> <p>tenure 78:12,16 94:17</p> <p>term 58:7 108:20</p> <p>terminated 18:24 19:2,7 58:4 81:6</p> <p>termination 58:16 59:10</p> <p>terminology 13:22</p> <p>terms 9:9 14:2 26:21 35:16 47:14 58:5 98:16</p> <p>tested 85:14</p> <p>testified 4:4 59:3</p> <p>testify 5:1 10:3</p> <p>testimony 5:3 54:23 61:5</p> <p>than 6:15 14:11</p>
--	--	--	--

39:14 42:21 46:24 61:14 65:10,15 68:1 70:12 101:5,8, 18 103:2,11 Thank 21:17,18,23 84:24 108:15 that 4:16,21 5:2,19 6:6,22 7:8,12,19, 22,24 8:14,21 9:11, 12,17,23,25 10:8,9, 19 11:1,6,9,10,13 12:2,12,13,23 13:7, 13,20,21,23,25 14:4,5,7,8,17,23,24 15:12,18,19 16:11, 12,15,18 17:6,7,12, 16,19 18:12,23 19:6,7,25 20:8,10 21:23 22:1,3,5,6,23 23:7,9,14,22 24:9 25:5,8,10,23 26:1,4 27:5,8,12,19 28:5, 7,15 29:2,6,7,9,25 30:1,19,22 31:12, 14,15,16,18 32:3 33:4,9,12,14,15 34:2,7,9,19,23,24, 25 35:1,3,17,18,19, 22,25 36:2,18,20 37:3,6,10 38:5,13, 15,17,18,22,25 39:20,22 40:1,2,5, 6,9,15,18,25 41:1, 2,7 42:1,7,8,17,20 43:3,5,7,21 44:11, 21 46:7,13,19 47:4, 6,8,14,16,19,22 48:7,12,22,23 49:1, 5,9,16 50:2,25 51:3,10,14,16,25 52:1,5,8,14,15,16 53:1 54:18,23 55:3, 5 56:12,15,16,20, 22,25 57:2,4,9,16	58:3,4,13,24,25 59:3,14,20 60:1,2, 21,22,23 62:10,16, 21,25 63:4,13 64:7, 11,13,15,16 65:3,5, 8,11,17,18 66:3,5 67:12,17 68:4,13, 15,19,20 69:3,5,10, 12,18,24 70:5,9,10, 11,14,18,19,20,22 71:8,11,15,17,18, 23,24 72:2,18,22 73:4,6,9,13,16 75:12,13,14 76:25 77:3,13,14 78:15, 22 79:16 80:6,10, 11,13,21 81:3,4,5, 17,21,22 82:1,2,3, 19 83:5 84:5,8,14, 15,17,18,20 85:3, 23 86:1,6 87:16 88:16,18,20,23 89:5,10,25 90:21 91:17,21 92:8,21, 24 93:14,18 94:10, 21,22 95:9,16 96:1, 6,13,15,18,24 97:12,18,21 99:10 100:24 101:3,4,5,7, 10 103:8,11,14,18, 21 104:2,7,12,17, 19,20,22,24,25 105:3,12,24 106:5, 7,21,22,23 107:14, 17,24,25 108:11 109:2,4,6,8,22,24, 25 110:3,7,9,11,14, 20 111:2,9,11,13, 18,22,25 112:12 113:6,17,19 that's 9:6,8 13:22, 23 14:2,10 17:23 18:6 19:19 23:15 24:17 28:9 29:19	30:12,25 31:8 34:6 38:19 40:3 43:17 44:22 46:1 52:7 55:3 56:15 58:5 59:6 62:10,15 63:2 69:22 71:2,4 73:15 74:19,21 75:14 80:18,22 81:1 82:7 86:2,18 88:22 94:11,13 95:5 96:14 97:24 98:1,7 100:19 101:12 102:23 106:18 109:21 111:19,20, 21 the 4:15,16,18,19, 24 5:5,19 6:11,14, 16,23,24,25 7:7 8:2,22,23 9:3,9,14, 15,16 10:16,17,18, 19,20,23 11:2,3,11, 17,19,25 12:4,5,7, 8,9,11,14,19 13:3, 6,10,11,12,15,17, 18,20,22 14:1,3,5, 6,11,12,13,15,16, 17,18,19,24 15:1,7, 8,10,11,14,15,17, 19,21,22,24 16:2,3, 4,16 17:1,5,6,8,9, 12,13,14,15,16,23 18:6,12,25 19:3,14, 20 20:3,5,14,22 21:7,25 22:11,13, 17 23:5,6,9,14,15, 22,23 24:22 25:11, 13 26:7,13,14,20 27:6,8,9,10,13,15, 16 28:6,17 29:3,4, 10,12,13,15,17,18, 21,22,23,24,25 30:4,7,8,10,11,13, 15,17,19,20,21,22 31:3,4,6,9,16,20,	22,24 32:3,4,6,19 33:3,4,7,11,12,18, 20,21,22,23,24 34:3,6,8,13,15,16, 21,22,24,25 35:4,5, 9,14,19,22,24 36:2, 6,16,19,20 37:4,9, 10,13,19,25 38:1,3, 6,8,17,19,20,23 39:1,2,23,24,25 40:3,4,6,7,15,16 41:11,12,14,15,16, 23 42:3,7,11 43:4, 16,20,24,25 44:1, 12,15,19,23,24 45:2,7,12,13,14,15, 18,23,24 46:8,12, 14,16,23,24 47:6, 13 48:7,11,12,19, 21,22,23,24 49:6,7, 8,16,22,24 50:4,7, 13,14,22,23,25 51:2,7,21 52:2,3,5, 12,17,22 53:3,4,7, 8,9,12,13,14,15,16 54:1,4,9,10,18,19, 20,21,22 55:3,6,13, 20,22 56:7,13,14, 21,25 57:5,7,19,20, 21 58:7,8,11,12,14, 16,20,24 59:1 60:3, 11,12,13,17,18,20, 24 61:4,11,12 62:6, 15,16,22,24 63:4,6, 8,10,17,19,24 64:6, 7 65:1,4,5,9,12,13, 18 66:4,6,7,8,11,12 67:5,13,14,15,16 68:1,2,20,21,24 69:4,7,9,12,16,20, 23 70:14,19,24 71:7,8,11,16,19,22, 25 72:2,3,6,10,11, 14,19,23 73:5,7,8, 15,18,20,22 74:4,
--	---	--	--

10,11,17,19 75:3,4, 5,7,10,11,17,19,21, 22,24 76:1,4,8,11, 14 77:7,8,13,19,20, 22,24 78:6,10,12, 18,20,21 79:5,6,7, 8,9,17,19,23,24 80:1,4,7,12,15,18, 23 81:1,2,8,20,22, 24 82:7,8,25 83:7, 9,22 84:5,11 85:6, 7,8,9,10,12,13,23 86:3,4,6,15,22,23, 24,25 87:5,6,7,13, 14 88:13,16,17,18, 19,21,22,24 89:17, 23 90:2,3,4,5,6,8, 10,11,15,19 91:2,3, 7,10,12,13,14,15, 25 92:3,5,11 93:4, 9,17 94:9,10,25 95:1,2,3,4,9,12,24 96:10,11,12,14,15, 16,19,21,22,23,24, 25 97:1,2,3,4,6,8, 11,16,20,22,24 98:1,5,7,19,22,23 99:1,12,15,25 100:1,3,5,9,10,11, 13,19,23,25 101:1, 2,3,4,20,21 102:1 103:2,3,7,10,17,19, 21 104:10,23 105:11,15,20,21,25 106:1,8,22,24,25 107:1,4,11,12,13, 19 108:2,3,4,5,6, 10,11,14,17,18,19, 20 109:3,23 110:2, 10,19 111:14,15, 18,19,20 112:3,10, 12,14,15,16,17,21, 22 113:2,5,11,16, 17,18,19,25	their 41:5 44:5 55:6 65:2,3,7 72:16 74:18 78:18,24 83:8 85:17 96:4 98:11 100:25 them 6:13 12:19,23 15:13 21:11,13,14 38:4,22 40:16 41:19 44:5 54:16, 25 55:8,25 60:13, 14 61:4 65:3,8 66:5 74:3,8,9,11,17,19, 20 79:17,24 82:5 83:24 93:9,24,25 97:15 98:4 99:9 103:9 106:20 108:21 112:25 theme 101:12 themselves 79:18 then 4:16 6:13,16, 24 7:1,11,12 8:5 11:5 12:7,13,14 13:2,21 14:3,9 15:4,9,14,15,23,25 16:3 17:5,8,9 23:7 25:14,16,21 26:8 27:16 28:13 29:11, 13 30:13 31:4 34:19,21 40:5,18 43:19,22 44:21 45:10 52:11 56:23 57:8 60:12,13 63:20,22 64:11 74:8 75:5,6 78:8,9 79:19,24 91:21 95:14 96:14 98:4 100:13 101:1 106:23 107:7,11,24 108:13 112:24,25 113:2,10 there 4:21 8:3 11:21,25 12:16,19 13:6 14:17,20	15:11,20,25 16:1 24:18 25:4 28:11 32:14,15 36:12,17 38:4 39:4 43:4 44:6,9,12 52:5,18, 20 53:7,13 61:8,9 69:20 71:6 73:5 74:6 78:12,17 79:1, 12,24 80:16 81:8 82:1,12 83:15 84:24 86:24 87:4 96:15,21,22 98:4 100:18,22 101:2 103:11,17 104:19 106:21 107:6 108:12,24 109:1,2, 5,8,22 111:1,3,24 112:9,11 there's 4:20 12:22 28:8 32:13 39:14 42:11 74:9 80:23 82:18 83:18 95:25 106:5 111:11 thereafter 99:23 thereby 92:2 these 21:10 22:20, 23 23:1,25 25:14 33:1,3 37:2 42:16 46:4 50:3,14 51:6 57:1,3 67:18 74:25 79:4 82:20 85:14 93:16 98:18,20 99:3,4 100:3,10 they 9:15 11:10 12:3,21 14:22 15:14 26:14,15,16 27:23 28:19,21 34:18,22 38:22 40:23,24 41:5,19 42:15,22,23 44:13, 16 46:5 54:7,8,11, 12,17,19,21 55:2, 25 56:1,4,7,9	59:14,20 61:25 62:8 70:12 74:10 77:15,18 80:2,16 82:17 83:12,16 85:14 95:20,21 96:3,6,10,12,25 97:1 101:8 107:23 108:5 112:19,24,25 they're 15:4 38:11 82:24 83:1 they've 79:23 thick 36:22,23 thing 62:5 66:3 94:9,10 106:3 109:10 things 7:25 9:2 10:5 16:10 25:14 26:18 42:16,24,25 51:21 57:4 65:20 113:10 think 6:21 17:13,14 19:19 20:7,24 21:11 23:22,25 31:14,16,20 36:4 50:1 53:4,6,9,15 62:13 70:14 76:7 80:23,24 81:4 83:1 87:15 101:16 102:21 104:1 108:13 110:14 111:18 112:15,16 113:2,8 third 67:15 92:2 this 17:19,21 18:8, 11,15 19:10,14,19 21:5 22:20 24:1,21 25:2,3 26:19,22 27:12 28:18 31:1 32:9,12 33:13 34:2, 3,17,18 36:23 41:20 44:2 45:8,10,
---	--	---	---

14,18,21,25 46:1,2 47:1,11 48:3,5,16, 17,20 49:12 50:14 51:15,16 53:21 54:2 55:12,20 56:6 57:11,13 58:19 61:13,24 62:4 63:7, 8,23 64:21 66:15, 17 67:1,7,8,9,10 69:12,16 72:9 75:7 76:16 78:10,11 82:18 84:1,13 86:12,13,17 87:1,9 89:14,22 90:2,15, 17 91:1,2,10,12,25 93:7 98:21 101:19, 20 102:8 106:6 108:23 109:3 110:15 113:15 those 8:19 9:7 13:7 16:9,15,17 20:10 23:2 24:2 26:18 27:21 39:2,3,7,17 42:9 43:18 47:4 50:25 51:2 58:5 59:7 60:4 61:14 63:6,8 73:1,8 74:1, 15 75:6,14 78:23 82:21,23 94:1,24 96:7 98:9 100:2 103:18 106:17 108:16 111:9 112:13 though 10:25 11:3 28:2 thought 33:12 36:23 81:2 86:23 96:24 threat 92:9 threatened 105:15, 17,21,22 threats 105:12,13	three 6:15 12:10,22 27:9,24 28:3 32:5 94:22,23 101:9 three-person 12:12 threshold 109:22 thresholds 110:8 through 7:9 13:18, 19,21 20:1 26:16, 17 27:6 33:5 34:16 37:18 38:24 40:14, 21 51:13 55:12 57:6 64:16 75:13, 14,21,24 83:6 85:6 98:20,25 99:1 103:3 107:9 time 5:14 7:10 10:16 12:10,22,25 14:8 15:11 25:9,14 27:5,13,14,15 28:6, 23 32:3 34:19,20 35:22 36:6 37:4,19 45:1 49:24 52:4,6, 17,22 54:17,19 55:1,2,3 62:6,25 63:5,12 64:7 65:19, 23 73:6 75:3,5 77:8 79:18 81:22 83:15, 17,20,21 96:6 98:20,23,24 99:15, 17,19,20 100:20 103:10,17 106:21 107:14,19 108:1 109:4 timeline 30:3,4 times 12:10 16:1,2 38:4 62:22,24,25 63:2 72:22,23 73:1, 8 95:2 100:12 105:11 106:14,15, 16 to 4:2,7,8,18,22 5:1,	16,21,23 6:14,21, 24 7:1,7,11,23,24 8:6,8,9,11,17,21 9:8,15,22 10:2,5,7, 24 11:22 12:11,14, 15 13:24 14:9,12, 15,22,25 16:3,4,24 17:1,4,8,9,14,18, 22,25 18:2,8,13,16, 23 19:3,6,10,15,20 20:1,2,4,9,11,22 21:10,13,14,19 22:4,6,8,9,10,13 23:3,6,7,8,24 24:2, 11,15,17,19,24,25 25:1,7,8,13,15,17, 18,19,22,23 26:21, 24 27:3,7,8,12,15, 18 28:21 29:3,4,5, 7,8,10,11,13,14,16, 17,18,23,24 30:2,7, 8,10,14,18,19,21, 23 31:3,5,6,17,20, 21,25 32:6,11,15 33:11,13,24 34:10, 12,14,20 35:1,11 36:18,19 37:1 38:2, 5,11,18,23 39:5,8, 9,10,11,12,13,19, 20,25 40:2,4,6,7, 16,19 41:1,3,4,12, 14,16,19,23 42:6,7, 10,17,19,21 43:6,9, 16,17,20,22,23,24, 25 44:1,3,4,5,12, 13,23,25 45:5,21, 24 46:3,6,8,16,20, 23 47:7,10,11,13, 22,25 48:2,9,19,24 49:14,15,18,19,20, 22,23,24 50:1,2,4,8 51:14,17,20,22 52:16 53:7,8,9,13, 15 54:2,11,25 55:4, 8,15,16,17,18,22,	25 56:2,4,7,10,15, 23 57:3,7,9,13,14, 17 58:1,18,24 59:1, 24 60:3,9,13,18,20, 24 61:20 62:12,14 63:14,16,17 64:5,7, 8,10,12,22 65:9,13, 17,20 66:12,13,21, 23,24 67:9,12,22 68:4,14,21,24,25 69:3,7,11,13,17 70:5,7,9,11,14,19, 20,24 71:7,23 72:6, 7,22 73:2,4,5,6,10, 14,23 74:2,3,7,8, 10,11,20 75:3,4,22 76:1,5,10 77:1,24 78:21,22,23 79:4,7, 16,18,25 80:3,4,7 81:4,10,11,17,23, 24 82:3,5,17,19,20 83:5,6,19 85:1,3, 10,14,17,24 86:2,7, 9,18 87:6,7 88:11, 12,16,22,24 89:10, 11 91:7,13,20 92:1, 2,3,4,7,10,11,14,15 93:4,9,10,15,16 94:2,6,12,22 95:1,3 96:14,16,19,23,24 97:1,15,16 98:6,12, 14 99:17 101:2,22 102:8,11,18 103:15,19,20 104:4,11,16,17,20, 24 105:2,12,15,17, 21,22,23,24 106:3, 4,5,9,10,20 107:11, 16,20 108:4,17,18, 22,23 109:4,12,13, 14,15,19,20,23 110:1,9,10,24,25 111:19,21 112:2, 10,12,16,17 113:9, 12
--	--	--	--

today 5:3	17,19,25 99:1	typically 12:12,18, 19,22 15:17 25:4,9 32:2 41:22 42:9,15 76:13 98:7	University 5:24 6:7 18:20
together 17:7 30:3 55:2	transfer 14:25		unless 31:24 92:10
told 52:9 54:9,12 61:20 62:25 95:2 102:21	transferring 14:24	typing 52:16,22,23	unlimited 112:7
too 16:22 21:6 76:16 78:10 103:18	transpired 52:8 107:25	<hr/> U <hr/>	unpack 73:9
took 11:6 97:14	transport 7:25 107:8	U.S. 6:11	unreasonable 76:24
top 22:17 23:6 45:14,15	trash 39:23,25	Uh-huh 9:10 64:3 96:20 111:4	unsubstantiated 61:8
totally 102:18	tried 53:15 74:2,7, 8,10 96:16 108:4	ultimately 29:1,15, 22 30:5	until 8:17 9:21 25:14 32:20 94:14
towards 22:11 95:5 97:3,4 111:16	trooper's 107:1	uncontrollably 69:2	up 12:8 13:18 14:15 16:3 17:18 19:11 20:21 21:25 25:13 32:19,23 33:14 34:17 41:19 45:3 47:17 48:21 58:8 66:12,22 67:1 70:24,25 71:5,6,8 82:16 84:1 86:3 87:17,18 89:2,10, 24 91:8 101:11 104:18 107:2,12, 18,22 109:12,13,14
town 28:18 62:7 111:12,13	truck 107:8	under 33:6 37:10 59:25 67:21 73:14 88:18,24 92:24 93:2,4 98:22 112:19	update 75:12
track 38:22	true 67:17 105:3	undergo 7:6	updates 75:14
trackable 38:25	try 40:16 53:8,9 59:24 79:7	understand 13:11 14:12,13 30:2,15 37:1 43:7 44:11 51:4 77:1,2 103:9 108:23 109:24 110:15	upon 91:24 92:12 93:5 96:10
traffic 40:5 79:25 107:3,4,6,10,21,25	trying 27:7 28:21 30:2 57:12 73:6,10, 14	understanding 46:23 78:15	us 13:21,25 17:25 18:2 26:25 32:5 34:22 62:1,14 67:8 75:14 79:22 90:14 91:13 102:8
trailer 107:12	turn 11:10 12:3,4 56:23 66:21 79:18	undetermined 25:13	usage 85:24
train 75:10,19 80:4, 7 85:17 88:11,12, 24	turned 9:15 10:24 53:3 97:3	uniform 64:6	use 13:3 39:11 40:11 42:8 46:22, 24 47:3 48:9 50:22, 23 58:5,7 66:4 69:21,23 70:14
trained 7:3 47:8 60:3 78:23 82:21 85:24 99:12 103:22	two 4:24 7:15,16,17 15:17,18 16:2 27:23 32:5 92:18 96:1 108:13	uniforms 25:1,6	
trainer 88:2	two-man 75:24	Union 23:21	
training 7:5,9,12 14:2 29:5,7,11,24 34:11 35:2 36:21 46:21,25 60:2 66:9 69:10 71:22,23 72:4,7 73:16 75:12, 13,17 83:2,6,8,13 85:5,11,14 87:18, 19 89:4,15 91:3 98:9,10,11,12,14,	two-year 19:15	unit 15:12 79:2,13 95:1	
	type 7:5 8:10 9:7 33:15 38:7 42:17 44:9,10 75:2 100:2	units 78:7	
	types 8:12		
	typewritten 52:18, 20		
	typical 11:25 37:19, 22 41:11 42:11		

71:11 72:19 73:5 75:11 77:20,23,24 79:24,25 81:9 83:9, 22 88:13,21 89:23 91:15 92:4 93:11 96:13 97:21 99:7,9 use-of-deadly-force 90:11 use-of-force 16:10, 14 40:13,14,21 41:8,9 44:9,24 45:3,22 48:21 50:24 51:6 52:3 58:23 61:1 63:11, 18 70:25 72:20,24 74:25 75:4 98:15 99:4 108:25 used 17:23 18:12 23:3 59:24,25 64:22 67:25 68:22, 23 69:19,25 73:25 74:12 80:2 82:2 83:19,24,25 85:5, 10,16,24 88:24 90:7 92:25 93:8 94:16,19 using 77:22 88:10, 25 90:6 91:24 utensils 82:25 <hr/> V <hr/> vacant 81:2 86:23 vaguely 31:14 63:12 Vance 5:20 6:14,16 7:8 8:5 10:13 11:2, 14,17 13:12 35:2 45:8,9,21 58:14 66:7,11 71:18,21, 24 72:3,7,10,14	75:7,10 76:15 78:6 82:10 85:10,16 87:13 88:17,19,22, 24 89:18 98:2 101:13 103:8 104:11 various 28:8 vehicle 96:10,15, 18,22,25 verbal 53:5 63:20 64:23 verbatim 53:2 very 61:2 77:19 93:15 102:21 104:7 107:9 vest 107:3 via 21:5 victim 58:20 victims 43:15 victims' 107:1 view 52:10 violated 58:25 59:14,20 violence 110:22 111:1,7 <hr/> W <hr/> wait 25:22 waiting 25:5,18 Wake 23:17 walk 33:7 37:18 41:19 55:12 56:24 walked 31:20 53:6 103:4 walking 65:7	WALLACE 4:2 want 4:8 11:22 13:24 18:8 19:10 21:12,13 24:19 37:1 41:14,16 44:23 47:10,13 50:3 61:20 63:16, 17 66:13,23 69:17 70:14,24 75:23 82:20 86:2 91:20 98:12 108:22,23 109:15,19 113:9 warehouse 86:23 113:20 warehouses 86:23 warrant 93:10 warrants 8:1 53:7, 8,14 92:18 96:8 was 4:3 5:14 6:6, 11,18,21,22,24 7:1, 12,16,18,23 8:8,11, 16,20,22 9:1,2,3, 15,20 10:18,21,22, 24 11:1,11,25 12:12,16,19,23,24 15:13,19,20,23,24 16:4,6,7,17 17:3,5, 13,14,16 19:17 20:15,17,18 21:21, 23 23:22 24:22 25:17 27:2,17 28:11,23,25 29:16 30:5,6,18,19 31:16 32:1,3,6,7 33:2,9 34:15,23 35:1,3,5, 6,7 36:12,17,22 37:3,9,16 38:4,5, 17,23,24 40:4,15, 17,18,25 41:15 42:7 43:4 44:6,9,21 46:11 48:14,22,23 49:9,12 50:13,22	51:12,13,14 52:5, 22,23 53:7,23 54:1, 4,13,18,20,22 55:1, 5 56:14,25 57:2,19 62:5,9 64:13 66:19 68:14 69:1,3,7,9, 13,17 71:12 73:5,6, 14,16,20 75:3,15, 17 80:11 81:2,3,5, 22 84:3 85:13,24 86:14,23,24 87:1,3, 4,9,11 88:16 89:7 90:24 92:14,15,18 93:2 94:10,25 95:9, 12,13,14,16 96:13, 15,17,19,21,22,24 97:6,8,11,12,19 98:17,22 99:24 100:1,22,24 101:1, 3,10 102:4,6,7,25 103:3,6,11,15,17, 18,19,21,23,25 104:1,2,4,7,8 106:21,22,23,25 107:4,10,14,16,19, 20 108:6,9,21 109:7,8 111:14,16 113:17,19 wash 34:20 wasn't 5:14 10:19 21:24 33:12 34:4, 25 36:6 51:10 77:9 87:4 95:23 103:1, 25 109:6,7,11 112:23 113:24 Watkins 12:24 13:4 49:14,21 55:15 56:11 58:12 93:23 94:8,10 Watkins' 56:14 way 4:21 5:11 28:24 32:13,22 33:9 34:15,24,25
--	--	--	--

35:5,21 43:9 72:6 82:3 87:10,12 93:17 106:8 110:10 111:15 Wayne 23:16 we 4:24 12:2,7,13, 16 13:20 14:9 15:17 16:1,2 17:7, 23,25 18:12 19:11 20:24 21:5,16 24:10,12,13,14 25:1,9,10,14,19,20 28:5,7,8,13,16,18, 19 29:4,12 30:5,22, 23 31:5,14,16,20 32:1,2,3,7,14 34:2, 20 42:20 45:2 46:9, 10 47:16 52:11 57:12 62:9,12,13 64:21 66:22 67:1 69:9 71:11 75:12, 13,24 76:3,4,7,18 77:12 78:8 79:24 80:21 82:1 88:15 89:9 90:10,18 91:2, 20 94:25 95:7,25 96:7 102:14 103:5, 7 108:9 110:2 113:8,10,16,25 we'd 28:14 we'll 21:16 25:11, 12 70:5 we're 8:4 19:11 20:22 23:6,25 24:25 27:6 29:23 46:9 57:20 60:3 62:12 66:17 79:18 91:13 94:23 we've 28:16 32:15, 20 42:19 62:24 79:5,15,16,17,21	weapon 88:14,15, 16,18,22,23 92:7 weapons 65:10,15 82:22 wearing 69:1 wears 64:6 week 7:14 49:9 weeks 7:15 weighted 85:15 Welborn 49:20 54:5,23,24 55:4,17, 19 56:3 58:12 77:16 93:22 94:6 Weldon 4:2 5:7 well 9:4 11:21 16:15 17:13 21:1,7 24:19 26:2 34:10 36:17 56:10 57:12 58:7 62:3 68:5 69:12 72:9 77:23 84:20 90:15 91:6 93:15,25 97:17,18 103:23 105:2 110:4 went 7:7,9 10:2 14:22 17:9 20:4,11 24:11 28:12 31:9 38:14,15 39:1 53:8, 13 87:7 96:23 100:24 101:2 were 6:20 7:3,24 8:3,6,14,19,24 9:11,17,23,25 10:8, 9 11:21,25 12:21 14:21 15:25 16:2,9, 21 21:4 32:24 33:8 37:6,8 38:4 40:24 41:18 44:12 54:11, 17,19,21,24 55:2 62:13 64:10 73:8, 10 75:1 76:8 77:15	80:2,12,15,16 82:12 83:16,20 88:2 94:14,24 95:7, 25 96:4,11 97:1 99:12 103:7,9,10, 21 104:19 108:14, 18 111:6,7,24 weren't 15:14 76:24 88:6 what 4:8 5:16,25 6:18 7:5,22 8:7,10, 24 9:12,20 10:15, 17,18 11:9,23,25 12:11 13:14 14:9 16:6 17:19,22 19:17,25 24:5,7,22 25:4,9,23 26:9,12, 14,22 28:10 30:13, 25 31:4,22 37:8,11 38:7,9,13,15,25 39:1,7,18,21 40:17 41:7,14,15,21,22 42:1,2,14 43:2,7 44:1,16 46:9 47:4 48:5,12 49:2,12 50:5,13,22 51:2,18 52:4,7,8,10,25 53:19 54:7,8,12 55:8,10,11,24,25 56:4,5,9,12,13 57:7,14,19,20,21, 23,24 58:7,21,22 59:21 61:20,22 62:2,5,11 64:18 66:4 67:8,10,12 68:4,14 69:17 70:12 71:4 72:16 73:3,13 74:4 75:15, 19,20 76:9 77:2 80:14 82:15,23 86:5,6,18,21 88:11, 20 89:3,12,24 90:4, 10 91:12 92:3,14 94:21,24 95:12,15	96:4 97:20 98:9,10, 11,14,24 99:10,20, 21 101:7,8 102:6 103:9,20 105:7,13 107:15,24 108:11, 18 109:19 112:13 what's 9:8 14:9 24:17 45:18 56:8 57:18 60:9 65:12 80:20 84:22 94:11 111:21 whatever 25:6 26:21 28:20 43:18 51:13 81:20 when 7:2,8 8:4,19 9:13,22 10:1,9,19 11:21,25 15:1 16:6 17:1 18:2 22:13 25:5,9 27:14,15,16 28:7 29:3 31:22 33:6,8,17 34:7 35:8,19 37:19 38:10 39:18,21 40:3 41:5,18 48:20 49:4,10 50:8 51:25 54:20,21 55:7,8 56:1 57:1,4 59:10, 13,14,19,20 60:11 64:22 65:22 68:8, 11 75:3,15 79:1 86:19 91:13 92:1 95:4 96:11 98:18, 21 99:2 100:12 101:1 103:21 105:5,8 110:23 111:13 where 5:16,23 6:6, 10 9:25 10:22 11:5 14:19 18:20,22 24:11 28:21 34:3 41:19 50:9,21 63:23 67:24 68:21 74:7,9 79:6,7,15,
---	---	---	---

21,23 80:15 81:1,8, 10,11 82:1 91:4,20 95:7 98:5 108:1 110:25 wherever 62:9 whether 12:15 15:2 17:3 21:22 29:23 30:23 42:4 54:18 55:5 which 14:15,18 15:5,23,24 17:4,23 23:3 34:15 36:7,20 39:4 40:25 43:9 45:13 46:22 48:20 50:15 66:15 68:8 75:1 76:8,22 79:13 80:2 85:12 91:2 92:15 95:25 99:7 100:20,23 103:11, 12 110:21 111:7 112:9 while 6:25 7:11,14 15:25 19:10,11 42:6 47:21 White 4:18,19,20 16:25 17:1 19:6 20:7 24:20 26:13, 24 27:18 28:1,25 29:16,20 30:10,18 31:1,7 32:4 33:7 35:6,8 36:10,11 47:14 49:15,19 51:1,3,6,9,19,24 54:1,20,22,24 55:5, 18 56:18 57:14 58:4 59:22 60:16, 20,23 63:2 68:21, 23,24 69:18 77:4 92:18,21 102:20 White's 18:15 19:22 21:2,22 24:3 26:9 27:20 37:4,20	48:9 50:6,18,21 55:9 58:13 69:2 77:8 who 12:16,21 13:7, 19 14:10,13,20 15:18,20,21 16:9 25:10 28:11,16,18 29:2,20 32:1,4,7 36:17 38:23 40:24 43:23 47:3 49:18, 24 54:1,4 56:1 60:20 61:9,10,14, 17 63:7,18 67:25 70:21 74:3 75:17 80:21 81:19,22 83:16,18,20 85:23 92:6,8 93:8 94:25 100:22 104:11 105:3,21 108:14 113:19 who's 13:19 83:13 whoever 32:3 whole 30:19,21 why 11:8,10 28:3,8 31:16 34:6 36:20 61:25 77:6 81:23 104:8 wife 111:14,17 will 4:10,18 5:5 21:16 24:15 28:10 42:7,22 45:5 46:5, 7,10,22 47:12 65:20 78:12 79:13 84:2 85:6,9,11 106:6 109:2 willing 19:15 21:9 wiped 107:13 with 6:13 7:11 9:21 13:7,21,25 23:25 26:12 28:15,17	32:3 33:14 35:13, 16 40:17 43:11 44:4,23,24 51:1,3, 5,8,19,23,24 52:12 53:5,9 54:10,20,22 55:18,22 56:7,17 57:9 58:14 60:1 61:14,18,19,22 62:14 63:1,7,9,10, 19 65:8 66:25 67:11 69:20,23 76:11,25 77:21 79:22 82:19 84:13, 15,18,21 85:18 86:4,17 88:11,13, 18,21,24 89:17,19, 20,21 91:19,21 93:21,22,23,25 94:11,12 95:2 100:1 101:5,10 102:19,22 104:17, 23 108:5,8 111:12, 14 within 14:8,17 15:5, 8,10 21:9 49:9 100:14,16,17 without 12:4 13:3 33:9 34:13 55:4 65:18 92:10 112:7 witness 4:13 23:23 36:16 42:4 45:23 46:14 48:12 67:5 84:11 86:6,15 90:5, 19 witnesses 43:14 woman 113:18,19 won't 34:12 wondering 97:19 Wood 5:11 wooded 96:23	woods 79:17 97:1,2 word 16:17 70:14 77:22 108:19 words 70:13 106:9 work 6:10 8:1 24:10 25:8 29:10 33:15 38:2,5 110:2 worked 6:12,14,23, 25 8:12 28:12 101:5,8,19 working 6:16 13:25 15:3,9,10 28:17 40:15 41:18 42:15, 23 43:1,2 61:6 81:21 86:24 100:23 104:25 105:10 106:23 107:19 110:10 worse 44:14,15 would 4:21 5:3 7:14,24,25 8:1 11:8 12:2,3,5,7,9,13 13:20 14:21,22 15:18 16:3,9,13,24 17:12 20:12,13,15 22:12 23:5 24:13, 23 25:7,18,21 26:3, 4,6,18,24 27:3,9 28:3 29:10,13 32:5, 6 33:7,8,23 34:16, 18,22 36:23 37:6 38:2,3,4,7,8 39:1,2, 3 40:5,14,15,16,19, 21,23,25 41:7,12, 13,22,24 42:1,3 43:3,5,9,10,14,15, 16,18,19,22,23 44:1 46:3,8 49:15, 23 52:14,15,18,20 60:1 62:20 63:25 64:11,12,14,16 65:1,3,5 75:19,21,
--	---	--	--

24 77:24 80:21 81:17,21 82:3,12 83:15 85:3,19,21 94:18 99:7,22 103:4,20 104:14, 20,21,22 105:3 106:15 110:12,14 112:3,16 wouldn't 20:17,18 27:11 35:12,13,22 39:25 40:2,9 41:3 43:13 53:16 64:8 81:23 82:17,19 87:24 wrap 67:1 wreck 106:23 107:4,17 wrist 60:8 65:2 67:14 write 39:1,8,9,10, 11,12,13,19,25 40:9 75:4 writes 41:14 writing 17:23 31:19 34:21 52:24 written 38:19 39:5 49:5,11 51:13 77:15,16,17 wrong 38:14 wrote 50:22 <hr/> X <hr/> X-RAY 25:13 <hr/> Y <hr/> yeah 16:20 17:12, 13 18:1 29:12 30:17 40:5 41:13	70:15 107:23 year 8:23 9:20 99:10,21,25 years 6:15 12:19 13:6 28:17 65:25 66:4 yes 4:14,17 5:4,21 7:4 10:14 11:15 12:18 16:23 18:21 19:2,8,18,24 22:1, 12,22,25 31:11 33:19 34:1 36:12 39:6 41:6 44:17 46:18 48:4,18 49:3 50:17,20 51:8 56:19 58:17 60:17 61:3,16 66:2,10 67:2 70:4 71:2,23 72:4,8,13,21 73:12, 19 74:14,22 75:9 78:1,8,25 79:3,11 80:17 81:18 82:7 83:11 84:7 86:18 87:2,15 89:13,16, 19,21 90:1,13,22 91:2,12 92:20,23 94:21 95:11,18 97:7,9 99:14 100:5, 22 101:25 102:3 104:6,7 105:9 106:13,18,19 111:8,23 112:11 113:6,21,23 yet 13:19 you 4:12,15,16,21, 22 5:1,5,10,12,16, 19,21,23,25 6:2,8, 10,20 7:2,3,5,14, 19,20,22,23,24,25 8:1,4,5,12,14 9:11, 17,22,25 10:1,7,8,9 11:21,22,25 12:11, 21 13:1,11,18,22,	23,24 14:3,4,9,21, 22 15:1,2,5,7,8,9, 15,23,24 16:5,6,8, 9,13,21,25 17:11, 19,21,24,25 18:3,4, 5,8,11,17,20,22,23, 25 19:10,14,15,21, 22 20:12,15,18,21 21:5,11,12,13,14, 17,18,21,23,25 22:3,6,8,9,10,12, 15,20 23:1,6,7,9,24 24:5,12,15,19,21, 24 25:17,25 26:4,8, 9,11,13,14 27:9,13, 18,20,24 28:3,18, 22 29:3,9,10 31:6, 12,22 32:2,7,10,11, 19,24 33:2,7,8,13, 17 34:9,10,12,15, 16 35:8,9,14,15,19 36:6,7,14 37:2,5,6, 8,25 38:3,7,22,23 39:8,9,10,11,12,13, 18,21,23,24,25 40:2,3,5,9,10,11, 22,24 41:1,11,12, 18,20,21,22 42:14, 16,19 43:4,5,7,9, 10,11,19,23 44:21, 23 45:5,7,10,16,24 46:5,12,13,16,19 47:6,7,8,12,14,19 48:5,16,19,20 49:4, 18 50:3,4,5,6,7,15, 18 51:1,3,5,6,23,25 52:10,13 53:2 54:1, 7,9,15,24 55:8,11, 24,25 56:1,5,10,17, 20 57:5,14,15,18, 19,21,25 58:3,7,9, 18,21,24 59:3,8,9, 13,15,17 60:9,11, 12,15,18,21,22,25 61:1,4,11,13,15,20,	22,24,25 62:3,4,7, 13,16,19 63:7,10, 14,16,17,20,22 64:4,8,10,12,14,16, 23,24 65:25 66:8, 13,21 67:4,8,24 68:2,7,8,11,14,17, 19,20 69:11,18,25 70:2,12,20,24 71:18,21,24 72:6, 18,22,23 73:1,10, 18,25 74:1,4,5,9, 12,15,23 75:1,22, 23 76:1,8,11,12,14, 16,22,25 77:1,13, 14,20 78:3,11 79:4, 9,23 80:7,13,20,21 81:3,5,15,23,24 82:12,21 83:3,9,12, 22,24 84:5,6,13,24, 25 85:1,3,19 86:1, 9,12,17,19 87:7,9, 16,21,24 88:2,6,9, 20 89:1,5,11,17,22 90:14,15 91:1,6,17 92:21,24 93:18,25 94:14,21 96:5 97:13,18,19 98:3, 14,16 99:2,4,10,12, 16,20,22,24 100:3, 6,8,9,12,16,20,21 101:7,15,16,18 102:1,9,11,15,16, 18,20,21,24 103:5, 8,10,13,14,16,21, 22,24,25 104:4,10, 14,18,22 105:2,5, 10,17,19,22,23 106:2,4,9,10,17,20 107:15 108:15,17, 18 109:3,4,10,15, 19 110:7,12,16,23 111:6,18,22 112:3 113:10,18,25
---	---	---	--

you're 5:2 14:4
21:8,9 33:10,17,24
39:23 44:24 49:2
65:6 67:12 77:2,7
84:21 86:7 87:21
89:24 105:6,8

you've 34:18 47:8
48:2 69:25 81:12
84:16 106:12

you-all 31:18 46:6
62:11,22 66:25
80:4 106:10 107:22

young 36:12,17

your 5:3,5,8,10 6:2,
8,18 8:1,2,7,25
16:6 21:10,15
22:23 33:8 35:20
36:8 37:2,4,19
39:24 40:3,12 41:1,
2 44:13 50:5,10,12,
15 51:4,10,19,22,
23 54:23 56:25
57:18 58:9,21
59:21 64:11 65:22
67:21 68:15,17,19
74:23 76:8,14 77:4
78:12,16 82:6
84:21 88:10 89:5,
14,22,23 90:11,21
92:15 93:15,16
94:13,17 97:19,21
100:14,16,17 102:4
105:6,8 110:4

yourself 72:20
87:24

P. White Dep.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

vs.

(taken via Zoom)

**CERTIFIED
TRANSCRIPT**

VANCE COUNTY, NORTH CAROLINA;
VANCE COUNTY SHERIFF'S OFFICE;
PETER WHITE, in his official
and individual capacities;
LAWRENCE D. BULLOCK, in his
official and individual
capacities; and WELDON WALLACE
BULLOCK, in his official and
individual capacities,

Defendants.

Oral deposition of WELDON WALLACE BULLOCK,
located in Vance County, North Carolina, taken by
Plaintiff on Thursday, February 25, 2021, commencing
at 10:06 a.m., before Janet Cooper Haas, a Registered
Professional Reporter and Notary Public located in
Charlotte, Mecklenburg County, North Carolina.



(866) 715-7770
advancedONE.com

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 LAW OFFICES OF SHARIKA M. ROBINSON, PLLC 3 BY: SHARIKA M. ROBINSON, ESQUIRE 4 MICHAEL MCGURL, ESQUIRE 5 10230 Berkeley Place Drive 6 Suite 220 7 Charlotte, North Carolina 28262 8 704.561.6771 9 srobinson@sharikamrobinsonlaw.com 10 mmcgrl@sharikamrobinsonlaw.com 11 Counsel for Plaintiff (via Zoom) 12 13 WOMBLE BOND DICKINSON 14 BY: CHRISTOPHER J. GEIS, ESQUIRE 15 LOUISA C. CLARK, ESQUIRE 16 One West 4th Street 17 Winston-Salem, North Carolina 27101 18 336.721.3543 19 chris.geis@wbd-us.com 20 louis.clark@wbd-us.com 21 Counsel for Defendants (via Zoom) 22 23 ALSO PRESENT: 24 25 Peter White, Defendant</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>1 Pursuant to NCGS 10B-25, WELDON WALLACE BULLOCK 2 having been duly sworn remotely, was examined and 3 testified as follows: 4 5 EXAMINATION 6 BY MS. ROBINSON: 7 Q. Good morning, Mr. Bullock. I'm not going to 8 repeat what I just said. Okay? But I did want to 9 introduce myself as Sharika Robinson. I have my 10 colleague, Michael McGurl -- he's here also and will 11 be participating. 12 Have you ever been deposed before or a 13 witness? 14 A. Yes, ma'am. 15 Q. You have? Okay. So you know the drill 16 then. The reporter -- everybody asks that you answer 17 questions in "yes" or "no." And for purposes of 18 I will refer to Mr. White, the Plaintiff, as 19 "Mr. White" and Sheriff White, the sheriff, as 20 "Sheriff White" so there's no confusion. 21 Is there any way that you would like for me to 22 to refer to you? 23 A. Mr. Bullock is fine. 24 Q. Mr. Bullock? So we don't confuse the two 25 Bullocks. Okay.</p>
<p style="text-align: right;">Page 3</p> <p>1 EXAMINATION INDEX 2 WELDON WALLACE BULLOCK (via Zoom) 3 BY MS. ROBINSON 4 5 EXHIBIT INDEX 6 7 Exhibit 1 3-4-17 J. White VCSO application 8 Exhibit 2 J. White background check letters 9 Exhibit 3 Directive B.9, Use of Force 10 Exhibit 4 J. White use-of-force administrative 11 investigation 12 Exhibit 5 BLET subject control/arrest techniques 13 Exhibit 6 Directive F.13, Use of Canines 14 Exhibit 7 8-20-18 A. Hight employee counseling 15 record 16 Exhibit 8 9-6-18 W. Bullock firearms 17 qualification record instructions 18 Exhibit 9 9-6-18 use-of-deadly-force handout</p>	<p style="text-align: right;">Page 5</p> <p>1 So are you prepared to testify? Have you 2 you're free of medications, free of anything that 3 would impair your testimony today? 4 A. Yes. 5 Q. Okay. So will you state your name for the 6 record. 7 A. Weldon Bullock. 8 Q. And your birthdate? 9 A. March 28th, 1967. 10 Q. Okay. Can you tell me your address? 11 A. 1029 Wood Owl Way in Durham, North Carolina. 12 Q. Okay. Have you always resided in North 13 Carolina? 14 A. For a brief period of time, I wasn't. 15 in New Jersey. 16 Q. What about high school? Where did you 17 high school? 18 A. In North Carolina. 19 Q. Can you tell me the name of that? 20 A. Vance Senior High. 21 Q. Yes. And did you go to college? 22 A. I did. 23 Q. Where did you go to college? 24 A. North Carolina Central University. 25 Q. Okay. And what did you major in?</p>

Page 6	Page 8
<p>1 A. Criminal justice.</p> <p>2 Q. Did you seek any education after your</p> <p>3 bachelor's degree?</p> <p>4 A. I briefly started on my master's in</p> <p>5 education, but I didn't complete it.</p> <p>6 Q. Okay. And where was that at?</p> <p>7 A. At North Carolina Central University.</p> <p>8 Q. Okay. So can you tell me about your career</p> <p>9 as a police officer or as a sheriff's deputy or -- so</p> <p>10 after college, where did you work?</p> <p>11 A. I was recruited by the U.S. Drug Enforcement</p> <p>12 Administration out of Newark, New Jersey. I worked</p> <p>13 with them briefly as an intern. And then I came back</p> <p>14 to Vance County, and I worked for the Vance County</p> <p>15 school system probably less than three</p> <p>16 years. Then in 1992, I started working at the</p> <p>17 Sheriff's Office.</p> <p>18 Q. Okay. What was your position</p> <p>19 initially?</p> <p>20 A. Deputy sheriff.</p> <p>21 Q. How long were you a deputy sheriff?</p> <p>22 A. I think my first promotion was</p> <p>23 investigator, and that was in 1997. So</p> <p>24 I worked the road as a deputy sheriff as a</p> <p>25 patrol deputy. Then I was switched to the civil</p> <p>division for a little while.</p>	<p>1 work court. You would serve your warrants and see</p> <p>2 your criminal papers from some of the subpoenas.</p> <p>3 Sometimes there were papers.</p> <p>4 Q. Okay. And so we're at -- 1992 is when</p> <p>5 started at Vance County Sheriff's Office, and the</p> <p>6 were promoted in 1997 to patrol.</p> <p>7 And what happened next in your career?</p> <p>8 I was promoted in 1997 to investigation</p> <p>9 To investigations? Okay.</p> <p>10 And what type of investigations?</p> <p>11 I was promoted to criminal investigation</p> <p>12 I worked, you know, all types of criminal cases.</p> <p>13 I came back</p> <p>14 Q. Okay. And how long were you in that</p> <p>15 position?</p> <p>16 Vance County. I was an investigator -- I was an</p> <p>17 investigator until 2005. I had to serve some act</p> <p>18 supervisor roles in investigation, but I don't know</p> <p>19 when those dates were. But once I came out of</p> <p>20 investigations, I came out of investigations and</p> <p>21 I was promoted to a lieutenant in administration, and t</p> <p>22 from was either 2004 or 2005. I'm not quite sure of t</p> <p>23 date. I mean, I'm not quite sure of the year.</p> <p>24 Q. All right. And as a lieutenant, what w</p> <p>25 your job duties?</p>
Page 7	Page 9
<p>1 then I was promoted to investigations.</p> <p>2 Q. Okay. So when you started as a deputy</p> <p>3 sheriff, were you trained at all?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. What type of training did you</p> <p>6 undergo?</p> <p>7 A. I went to the basic law enforcement school</p> <p>8 here in Vance County, and when I completed</p> <p>9 that basic law enforcement school, I went through a</p> <p>10 training phase for about -- I'm not sure of how</p> <p>11 long a time. I had to ride with a sergeant for a while</p> <p>12 once I finished that training phase, then I was</p> <p>13 of on my own.</p> <p>14 Q. Okay. "For a while," would you say a week</p> <p>15 or two weeks or --</p> <p>16 A. No. It -- it was -- it was at least two</p> <p>17 months, a minimum of two months. It might have been</p> <p>18 longer, and I don't know how long it was.</p> <p>19 Q. Okay. So you mentioned that you started</p> <p>20 at -- so you started as a deputy sheriff, and you did</p> <p>21 a little patrol.</p> <p>22 Can you explain what that entailed?</p> <p>23 A. You were assigned to a district, and you</p> <p>24 would answer calls that were given to you.</p> <p>25 You would do things like transport mental patients</p>	<p>1 A. I was an administrative lieutenant. I</p> <p>2 kept records. I was -- I believe I was doing thi</p> <p>3 in evidence. I was over the civil division. I c</p> <p>4 administrative investigations. Well, I actually</p> <p>5 administrative investigations as early as -- in m</p> <p>6 since my criminal -- that's my investigative posi</p> <p>7 I continued doing those type investigations.</p> <p>8 Right now, that's what's coming to mind</p> <p>9 Q. Okay. In terms of the obligations?</p> <p>10 A. Uh-huh.</p> <p>11 Q. So you said that you were over evidence</p> <p>12 What does that mean?</p> <p>13 A. When deputies or investigators, offices</p> <p>14 the sheriff's office collected evidence on the sc</p> <p>15 I was the person they turned it in to, and I was</p> <p>16 at least one of the evidence room.</p> <p>17 Q. Okay. And how long were you in that</p> <p>18 position?</p> <p>19 I started as an investigator, and I don't</p> <p>20 know how long. And in some form or fashion, I w</p> <p>21 involved with it until I retired.</p> <p>22 Q. Okay. Did you ever go to court when yo</p> <p>23 were in that position?</p> <p>24 A. You would I did.</p> <p>25 Q. Is that where you were primarily depose</p>

Page 10	Page 12
<p>1 A. No. I've been deposed on -- when 2 "go to court," I went to court in criminal cases to 3 testify in criminal cases. 4 Q. Okay. 5 A. Things from homicide to break-ins, having the in-house application done. I would do 6 sex abuse cases. criminal background check, a pre-employment criminal 7 Q. Okay. So I'm going to come back to you background check, on the applicant, and then we would 8 saying that you were specifically over evidence. the applicant up for an interview. 9 When you were in that position, did you ever 10 misplace or lose evidence? The applicant would come in for an interview 11 A. No. I never misplace or lose evidence. I know, according to what the circumstances are 12 Q. Had evidence ever been misplaced of any kind, that was a three-person panel interview 13 Vance County? and then once that process is complete, then we would 14 A. Yes. make our recommendations to the sheriff and then 15 Q. In what situation? whether or not to hire or not to hire or our opinion 16 A. I can remember one time one of the drug Q. Who is "we"? Was there a specific panel 17 officers, what he -- what he noted on the sealed designated panel? 18 envelope as far as the money -- what he noted was an Yes. So, typically -- and I don't remember 19 amount that wasn't in the sealed envelope. When told over the years. But, typically, there were 20 lawyer and I sat down and opened the sealed envelope, myself, and maybe a captain or another 21 it was, like, \$20 short. lieutenant. So I don't know who they were, you know 22 I remember an incident where a gun was taken 23 from an investigative scene out in the public that -- Lieutenant Shearin was one of them that I 24 never -- it was never turned in to evidence. remember and Watkins. I don't know if he was a 25 received it into evidence. And even though a captain or lieutenant over time. He might have been</p>	<p>11 hiring process of a sheriff's deputy? 2 cases to We would have an in-house application to 3 someone may turn in, or sometimes they would go on 4 and turn in the F-3 form without going -- having 5 the in-house application done. I would do 6 criminal background check, a pre-employment criminal 7 background check, on the applicant, and then we would 8 the applicant up for an interview. 9 The applicant would come in for an interview 10 as little as one time, as many maybe as three times 11 I know, according to what the circumstances are 12 of any kind, that was a three-person panel interview 13 and then once that process is complete, then we would 14 make our recommendations to the sheriff and then 15 whether or not to hire or not to hire or our opinion 16 Q. Who is "we"? Was there a specific panel 17 designated panel? 18 Yes. So, typically -- and I don't remember 19 over the years. But, typically, there were 20 myself, and maybe a captain or another 21 lieutenant. So I don't know who they were, you know 22 a gun was taken 23 public that -- Lieutenant Shearin was one of them that I 24 remember and Watkins. I don't know if he was a 25 a captain or lieutenant over time. He might have been</p>
Page 11	Page 13
<p>1 received it into evidence, it was still something that 2 the Vance County Sheriff's Office at some point had 3 control over, even though it never made it into the 4 evidence room. 5 And then I remember an incident where 6 deputy took a gun off of somebody, and that never got 7 into evidence. It never made it into evidence. 8 Q. Why would items never make it into evidence? 9 A. I can't answer that. I can't answer who 10 why somebody else did something, that they didn't turn 11 it in. I was the one responsible for it once it got 12 into evidence. 13 Q. Okay. But did situations like that ever not in law enforcement at all. Just pretend 14 happen before at Vance County -- in Vance County 15 A. Yes, ma'am. 16 Q. Okay. So let's change gears a little bit 17 and discuss the current hiring process at the Vance 18 County Sheriff's Office. So the -- starting from the lower level 19 A. I don't know anything about the current -- who's hired and not gone through BLET yet. 20 hiring process. I don't -- I'm retired I don't know 21 Q. Well, when you were there. I don't know 22 I don't want you to speak for, you know, Sheriff Brame 23 and what he does. that's -- you know, the kind of termino 24 A. Okay. for that is -- you know, that's, like, a candidat 25 Q. So when you were there, what was the typical</p>	<p>11 You know, at some point, he might have 12 lieutenant. Then he might have been a captain. 13 it into the use of names without the rank, Shearin has done 14 it, Watkins has done it, I believe Shelton has done 15 it, Stainback has done it. 16 that never got So over the years, there have been different 17 people that -- along with me who have performed that 18 Q. -- But it's been primarily lieutenants? 19 Primarily, the lieutenants or higher. 20 Can you help me understand just the 21 structure of the Vance County Sheriff's Office. 22 that's -- you know, the kind of termino 23 for that is -- you know, that's, like, a candidat 24 a new hire or, you know, however you want to do it 25 The typical</p>

Page 14	Page 16
<p>1 but hadn't done the state basic law enforcement training. In terms of responsibility, that's probably the lowest level of responsibility. And then you'd team up to report to the chief deputy. The you're a deputy once you finish out that period. Chief Deputy was directly to the sheriff. the deputies are the ones that primarily take on the bulk of the calls and do the -- serving the stuff like that.</p> <p>2 Within that shift over time, is sergeant, then you may have what's -- what as a senior deputy. And that's a deputy experience than the BLET candidate, has long enough to kind of understand the of deputy, who may understand the roles supervisor but not -- has not been officially to sergeant, which is the next step up.</p> <p>3 The sergeant is the first-line that runs the shift, and within that shift, deputies in which is he supervises on the the same instance where -- on the patrol criminal investigations, there may be in an instance, would have been promoted a deputy and you went to -- as a detective consider that a promotion.</p> <p>4 Some may say that the -- transferring sergeant to a detective may be a lateral</p>	<p>1 times we did and did not have a chief deputy. That's reasonable. We had a chief deputy, and the two cap the lowest level of responsibility. And then you'd team up to report to the chief deputy. The you're a deputy once you finish out that period. Chief Deputy was directly to the sheriff. the deputies are the ones that primarily take on the bulk of the calls and do the -- serving the stuff like that.</p> <p>2 A. I was chief deputy.</p> <p>3 Chief deputy? And so as chief deputy, were over -- you were one of those people who would hire and make use-of-force decisions and things of that nature?</p> <p>4 Say that again.</p> <p>5 Q. You would hire, make hiring decisions and make recommendations and use-of-force decisions?</p> <p>6 A. Well, that -- some of those recommendations I don't -- "decision" might not be the right word. But some of those recommendations, I think that as a captain.</p> <p>7 Q. As a captain?</p> <p>8 Yeah.</p> <p>9 But you were definitely doing it as a captain, too, also, right, recommendations?</p> <p>10 A. Yes.</p> <p>11 Okay. So I would like to talk more about Mr. White specifically. Can you -- can you explain</p>
Page 15	Page 17
<p>1 of because the pay is almost the same whether it's a promotion or not, but you have nonsupervisory employees working. It's just deputies, but they're called investigators. Some of them. I don't know which one. He sat down within investigations, you have a supervisor, a sergeant, and then the panel interviewed him. I was a sergeant, a detective sergeant.</p> <p>2 On the same line, you may have a civil division. Within the civil division, you have deputies working, and then you may have a sergeant working within the civil division.</p> <p>3 Over time there have been detectives in the drug unit that may or may not have a sergeant supervising them. Sometimes it was a sergeant, sometimes they weren't. And then after the sergeant level, then you have the starting of the command level, then you have the starting of the command level of lieutenants.</p> <p>4 In the patrol division, typically lieutenants that would supervise two sergeants who supervised however number of deputies the shift. In investigation, there was a lieutenant who supervised the sergeant, who supervised the investigators on the shift.</p> <p>5 Then you had a patrol commander, which was the position I served in for a while. And</p>	<p>1 the hiring process when it came to Mr. White.</p> <p>2 A. Just like before, he filled out an application, whether it was in-house or he had an application. I don't know which one. He sat down with a panel, and then the panel interviewed him. I was the one that did his criminal background check.</p> <p>3 And once we got all of that stuff together, the sheriff made the decision to hire him. Then once he got hired, he eventually went to the patrol division.</p> <p>4 Q. Did you review his application?</p> <p>5 A. Yeah. I would have been the one that reviewed his application, his -- well, yeah. I think I was the first officer to see his application. I don't know if the sheriff saw it before I did, but I had it extensively because I was the one that actually did the background check.</p> <p>6 Q. Okay. I'm going -- I'm going to pull up his application and make sure that this is what you looked at.</p> <p>7 Can you take a look at this document.</p> <p>8 A. It looks like what I remember to be his application. That's the form which we used.</p> <p>9 Just review it for -- can you scroll -- can we continue to scroll?</p>



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

Page 18	Page 20	
<p>1 A. Yeah.</p> <p>2 Q. Okay. Just let us know when to keep going.</p> <p>3 A. Keep going. Okay. Okay. You can go.</p> <p>4 Okay. You can go. Okay. You can go.</p> <p>5 go. Okay. You can go. You can go.</p> <p>6 Q. That's the last page, Mr. Bullock.</p> <p>7 A. Okay.</p> <p>8 Q. I want to ask you some questions about this</p> <p>9 document.</p> <p>10 A. Okay.</p> <p>11 Q. So you -- can you identify this document?</p> <p>12 A. It's the document that we used as an</p> <p>13 in-house form to gather information on potential</p> <p>14 applicants.</p> <p>15 Q. Okay. And this is Mr. White's application?</p> <p>16 A. I believe it to be.</p> <p>17 MS. ROBINSON: Okay. Michael,</p> <p>18 scroll. And stop right here.</p> <p>19 BY MS. ROBINSON:</p> <p>20 Q. Do you see where it says Shaw University?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And you see where it says "reason for</p> <p>23 leaving"? Can you read that to me.</p> <p>24 A. "Terminated."</p> <p>25 Q. And Louisburg College. Can you read the</p>	<p>1 A. I have to go through DCI and run his</p> <p>2 record, his driving record. I have to g</p> <p>3 request from the clerk of courts anyplace he's ei</p> <p>4 Okay. You can go to school or graduated from high sc</p> <p>5 and pull the criminal records from the clerk of</p> <p>6 courts.</p> <p>7 I think Mr. White had gotten some higher</p> <p>8 that might have been outside of North</p> <p>9 Carolina, and so I might have had to request for</p> <p>10 criminal histories in those places that he lived</p> <p>11 school outside of North Carolina.</p> <p>12 as an Q. So would you say --</p> <p>13 potential A. His driving record would have been also</p> <p>14 part of the criminal background check.</p> <p>15 application? Would you say it was a pretty extensive</p> <p>16 background check?</p> <p>17 can you A. I wouldn't say it was extensive.</p> <p>18 Q. You wouldn't say it was?</p> <p>19 A. No.</p> <p>20 University? Okay.</p> <p>21 MS. ROBINSON: Michael, can you pull up</p> <p>22 the -- so we're going to mark Exhibit Number</p> <p>23 So --</p> <p>24 MR. GEIS: I don't think we marked</p> <p>25 Exhibit Number 1.</p>	
Page 19	Page 21	
<p>1 reason for leaving.</p> <p>2 A. Yes. "Terminated."</p> <p>3 MS. ROBINSON: Let's go to the next. Let's</p> <p>4 go down a little bit more.</p> <p>5 BY MS. ROBINSON:</p> <p>6 Q. So is it fair to say that Mr. White</p> <p>7 disclosed that he had been terminated?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. And let's go down. I have another</p> <p>10 question I want to ask you about this document while</p> <p>11 we're up -- while we have it up.</p> <p>12 MS. ROBINSON: Keep going. Keep going.</p> <p>13 BY MS. ROBINSON:</p> <p>14 Q. Can you read the last sentence on this page.</p> <p>15 A. "Are you willing to sign a two-year contract</p> <p>16 for employment?"</p> <p>17 Q. And what was his response?</p> <p>18 A. Yes.</p> <p>19 Q. I think that's it for this document. (Bell</p> <p>20 get back to the contract.</p> <p>21 So after you -- after you reviewed</p> <p>22 Mr. White's application, you said you conducted</p> <p>23 criminal background check?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. What did that entail?</p>	<p>1 MS. ROBINSON: Well, let's mark</p> <p>2 Exhibit Number 1 as Mr. White's application</p> <p>3 next. Employment.</p> <p>4 (Exhibits 1 and 2 were marked for identificatio</p> <p>5 MS. ROBINSON: And we sent you this via</p> <p>6 email, too, Mr. Geis.</p> <p>7 MR. GEIS: Well, I didn't get the email</p> <p>8 and I looked at my emails 30 minutes ago. Y</p> <p>9 perfectly willing -- or you're perfectly wit</p> <p>10 her rights to introduce these documents. I</p> <p>11 think you should mark them.</p> <p>12 MS. ROBINSON: All right. I want you -</p> <p>13 want you to have them. Okay? And you do ha</p> <p>14 So if you need to take a break and ch</p> <p>15 email, please let me know.</p> <p>16 MR. GEIS: We will take a break. We'll</p> <p>17 about a ten-minute break. Thank you.</p> <p>18 MS. ROBINSON: Thank you.</p> <p>19 Less in proceedings from 10:35 to 11:01 a.m</p> <p>20 BY MS. ROBINSON:</p> <p>21 Q. So, Mr. Bullock, I was asking you about</p> <p>22 Mr. White's background, and I asked whether or no</p> <p>23 was extensive or not. Thank you. And you said t</p> <p>24 it wasn't extensive.</p> <p>25 MS. ROBINSON: Michael, can you pull up</p>	

Page 22	Page 24
<p>1 document that shows -- yes.</p> <p>2 BY MS. ROBINSON:</p> <p>3 Q. Can you see that document?</p> <p>4 MS. ROBINSON: Let's go to Page 1</p> <p>5 Chris can identify that.</p> <p>6 MR. GEIS: You need to read that.</p> <p>7 BY MS. ROBINSON:</p> <p>8 Q. And I'm going to give you a few</p> <p>9 23-page document, so I'm going to give you a few</p> <p>10 you know, as long as you like to look over it.</p> <p>11 A. Can I move towards the screen?</p> <p>12 Q. Yes, sir. And, Mr. Bullock, if you would</p> <p>13 just let him know when to scroll down in the same</p> <p>14 fashion.</p> <p>15 A. You can scroll down. Okay.</p> <p>16 Okay. Okay. Okay. Okay. Okay. Okay.</p> <p>17 Put it so I can see the top of it. Okay.</p> <p>18 Okay. Okay. Okay. Okay. Okay. Okay.</p> <p>19 Okay. Okay.</p> <p>20 Q. And do you recognize this document</p> <p>21 documents?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. And is that your signature on these</p> <p>24 documents?</p> <p>25 A. Yes, ma'am.</p>	<p>1 documents, this exhibit.</p> <p>2 And so after reaching out to all those</p> <p>3 counties, obtaining Mr. White's criminal record,</p> <p>4 driving record, and other -- and reviewing his</p> <p>5 application, what questions did you have about his</p> <p>6 employment?</p> <p>7 A. About his what?</p> <p>8 Q. About his prospects for employment.</p> <p>9 A. I don't remember specific questions that</p> <p>10 had. We, in general, go over people's work histo</p> <p>11 where he went to school, where he lived, any crim</p> <p>12 you may have. We might talk about his</p> <p>13 same's history. We would talk about his employ</p> <p>14 history. We might -- some people we give, like,</p> <p>15 Okay. Okay. scenarios on how you will respond to a</p> <p>16 particular scenario.</p> <p>17 Okay. That's what's coming to mind right now.</p> <p>18 Okay. There may be others.</p> <p>19 Q. Well, I want you to, if you can recall,</p> <p>20 be these specific now about Mr. White.</p> <p>21 After you performed this background che</p> <p>22 him, what was his next step in the employment pro</p> <p>23 A. He would have been sworn in. And at sc</p> <p>24 point, he'll go to a shift. You know, he might n</p> <p>25 have immediately gone to a shift because we're a</p>
Page 23	Page 25
<p>1 Q. And can you identify these documents?</p> <p>2 A. Those forms -- those AOC forms are at this point.</p> <p>3 which I used to reach out to our clerks of courts point.</p> <p>4 requests for criminal background information.</p> <p>5 Q. And for purposes of the record, I would just</p> <p>6 like for you to -- we're going to start from the top</p> <p>7 and go to -- and then each county that you reached out</p> <p>8 to.</p> <p>9 Can you read that county. Just read the</p> <p>10 county.</p> <p>11 A. Martin County, North Carolina; Meriwether</p> <p>12 County, New Hampshire; Hillsborough County, New</p> <p>13 Hampshire; Hillsborough County, New Hampshire</p> <p>14 Is that the same document?</p> <p>15 Q. That's the same document.</p> <p>16 A. Okay. Wayne County, North Carolina;</p> <p>17 Franklin County, North Carolina; Wake County, North</p> <p>18 Carolina; Bertie County, North Carolina; Chowan</p> <p>19 County, North Carolina; Pasquotank County, North</p> <p>20 Carolina; Perquimans County, North Carolina; Pamlico</p> <p>21 County, North Carolina; Union County, North Carolina.</p> <p>22 Q. I think that was the last county, correct?</p> <p>23 A. (The witness nodded.)</p> <p>24 Q. And I'm going to ask you some more</p> <p>25 questions, but I think we're done with these</p>	<p>all, poor county. We might not have uniforms t</p> <p>are at this point. Sometimes cars aren't available a</p> <p>Typically, what happens is there may be</p> <p>period, depending on when that applicant</p> <p>base of uniforms and whatever, other</p> <p>conditions he might have. Like, he would hav</p> <p>go qualify for his service work, so that had to t</p> <p>And so typically what we do when we have p</p> <p>who are kind of caught in that phase, we have --</p> <p>Meriwether -- the sheriff's office is responsible for</p> <p>house security, and so sometimes we'll send</p> <p>people up to the X-ray for an undetermined amount</p> <p>time until all these things come, and then we can</p> <p>him ready to go to a shift.</p> <p>Then once he goes -- if he's -- in his</p> <p>particular case, he was hired to be a deputy. So</p> <p>know, he would be waiting for a shift assignment</p> <p>a shift. Some people we hire, and we have a -</p> <p>like an investigator's opening, and we hire an</p> <p>investigator. Then an investigator would go stra</p> <p>Investigation. But, again, everybody has to w</p> <p>to get qualified because of what happens at that</p> <p>point.</p> <p>After he's sworn in, he's -- you know,</p>

<p style="text-align: right;">Page 26</p> <p>1 a sworn deputy sheriff at that point.</p> <p>2 Q. Okay. Well, let's rewind. Let's rewind.</p> <p>3 He would have had his panel interview before why would you ever perform three panel</p> <p>4 you ran his background, or would that panel interviews?</p> <p>5 have come afterwards?</p> <p>6 A. No. I would have ran his background ahead of time sometimes. Sometimes the appli</p> <p>7 the panel review.</p> <p>8 Q. Okay. So after you ran his background, then there's just various reasons why we do i</p> <p>9 explain what happened next in Mr. White's case, if you And, again, a minimum of one that's bee</p> <p>10 can recall.</p> <p>11 A. I can't recall specifically. I can't recall specifically where before and he went and, say, worked a</p> <p>12 what I generally do. I can't recall specifically where before and he went and, say, worked a</p> <p>13 Mr. White. But you know, I -- the background is done in one place and then came back shortly after.</p> <p>14 different forms. They come in what you see here, they might have a one panel interview because we</p> <p>15 Administrative Office of Courts request they come familiar with that particular officer.</p> <p>16 through DCI, they come through NCIC, and they come Sometimes we have people who we've been</p> <p>17 through DMV.</p> <p>18 working with for years, like, at the police</p> <p>19 So I would have done all those things, and department. This is a small town, who we all --</p> <p>20 this stuff I may have gotten back or may not know we know. They might have an interview -- a</p> <p>21 gotten back. I'm caught at the mercy of the minimum of one. And some people, for whatever</p> <p>22 terms of getting back whatever informati on I need to, background, where they live, trying to g</p> <p>23 get back. And what -- but all this stuff is information in, you know, it's just -- it's no --</p> <p>24 and it's always compiling.</p> <p>25 Mr. White would have had to provide particular way.</p> <p>26 copy of his Okay. So moving on. So Mr. White was</p>	<p style="text-align: right;">Page 28</p> <p>1 Mr. White specifically, I do not recall how many.</p> <p>2 of one, though.</p> <p>3</p> <p>4</p> <p>5 A. Sometimes we get information that we do</p> <p>6 have ahead of time sometimes. Sometimes the appli</p> <p>7 might not have information that we need when we a</p> <p>8 There's just various reasons why we do i</p> <p>9 And, again, a minimum of one that's bee</p> <p>10 done. For an example, what will be an example of</p> <p>11 minimum of one, let's say there was an officer wh</p> <p>12 specifically where before and he went and, say, worked a</p> <p>13 in one place and then came back shortly after.</p> <p>14 see here, they might have a one panel interview because we</p> <p>15 They're familiar with that particular officer.</p> <p>16 Sometimes we have people who we've been</p> <p>17 working with for years, like, at the police</p> <p>18 department. This is a small town, who we all --</p> <p>19 know we know. They might have an interview -- a</p> <p>20 minimum of one. And some people, for whatever</p> <p>21 I need to, background, where they live, trying to g</p> <p>22 information in, you know, it's just -- it's no --</p> <p>23 no concrete reason every single time it was done</p> <p>24 provide particular way.</p> <p>25 copy of his Okay. So moving on. So Mr. White was</p>
<p style="text-align: right;">Page 27</p> <p>1 driver's license, social security card.</p> <p>2 was a previously sworn law enforcement officer, I</p> <p>3 would have had to have gotten his basic Law</p> <p>4 enforcement certificate.</p> <p>5 A. The recommendation to hire -- when you</p> <p>6 So at some point in time, all that stuff training standards. To training standards,</p> <p>7 being gathered and compiled as we're going through the recommendation. It should be on a form</p> <p>8 process of trying to get him hired.</p> <p>9 that I sent to training standards saying I recomm</p> <p>10 Q. Okay. But is it safe to say that the panel,</p> <p>11 the three panel, would have convened after you Q. Okay. So can you tell me, how does tha</p> <p>12 received all of the necessary documents? process work? Would you recommend him for hire t</p> <p>13 A. No, no. Not necessarily. It would be sheriff first and then to training standards or -</p> <p>14 safe to say that, because, again, some of this stuff Yeah. After we finish the last panel</p> <p>15 you get back ahead of time; some of the stuff in interview, then a recommendation would be made to</p> <p>16 don't get back ahead of time. It just depends on whether to hire or not to hire.</p> <p>17 I had time to put it out, when I sat down at the Q. Okay. And so the recommendation ultima</p> <p>18 computer and ran the information and then was recommended to hire Mr. White?</p> <p>19 panel interview was.</p> <p>20 A. Not to the sheriff.</p> <p>21 Specifically to Mr. White, I can't tell you Not to the sheriff?</p> <p>22 how that fell in line.</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. Do you recall Mr. White's panel Q. So who recommended Mr. White for hire?</p> <p>25 interview and how many of those interviews he had? Once the panel -- our recommendations i</p> <p>26 A. I do not. He had a minimum of one, just a recommendation. Ultimately, the sheriff h</p> <p>27 like anybody else, they could do one or two. The last say on whether or not we're going to swe</p> <p>28 really depends. And maybe sometimes even three. You and I get all the information to training</p> <p>29 know, it depends on certain circumstances. Standards. He has that final say; the panel does</p>	<p style="text-align: right;">Page 29</p> <p>1 ultimately recommended for hire.</p> <p>2 Because Who made that recommendation?</p> <p>3 Law A. The recommendation to hire -- when you</p> <p>4 first recommended to hire, we send it to the sher</p> <p>5 that stuff training standards. To training standards,</p> <p>6 being gathered and compiled as we're going through the recommendation. It should be on a form</p> <p>7 that I sent to training standards saying I recomm</p> <p>8 Q. Okay. But is it safe to say that the panel,</p> <p>9 the three panel, would have convened after you Q. Okay. So can you tell me, how does tha</p> <p>10 received all of the necessary documents? process work? Would you recommend him for hire t</p> <p>11 A. No, no. Not necessarily. It would be sheriff first and then to training standards or -</p> <p>12 safe to say that, because, again, some of this stuff Yeah. After we finish the last panel</p> <p>13 you get back ahead of time; some of the stuff in interview, then a recommendation would be made to</p> <p>14 don't get back ahead of time. It just depends on whether to hire or not to hire.</p> <p>15 I had time to put it out, when I sat down at the Q. Okay. And so the recommendation ultima</p> <p>16 computer and ran the information and then was recommended to hire Mr. White?</p> <p>17 panel interview was.</p> <p>18 A. Not to the sheriff.</p> <p>19 Specifically to Mr. White, I can't tell you Not to the sheriff?</p> <p>20 how that fell in line.</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Do you recall Mr. White's panel Q. So who recommended Mr. White for hire?</p> <p>23 interview and how many of those interviews he had? Once the panel -- our recommendations i</p> <p>24 A. I do not. He had a minimum of one, just a recommendation. Ultimately, the sheriff h</p> <p>25 like anybody else, they could do one or two. The last say on whether or not we're going to swe</p> <p>26 really depends. And maybe sometimes even three. You and I get all the information to training</p> <p>27 know, it depends on certain circumstances. Standards. He has that final say; the panel does</p>

Page 30	Page 32
<p>1 have that final say.</p> <p>2 Q. Okay. I understand. I'm just</p> <p>3 a timeline together.</p> <p>4 A. I don't know the timeline. I</p> <p>5 Q. So -- but he was ultimately --</p> <p>6 was hired.</p> <p>7 So the panel recommended him to</p> <p>8 A. No, the panel did not recommend</p> <p>9 hired.</p> <p>10 Q. The panel didn't recommend Mr.</p> <p>11 hired by the sheriff?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. So what did the panel</p> <p>14 didn't recommend him to be hired?</p> <p>15 A. I don't -- maybe I don't understand</p> <p>16 question.</p> <p>17 Q. Yeah. If the panel convened and</p> <p>18 Mr. White to determine if he was to be</p> <p>19 the sheriff to be hired, right, that was</p> <p>20 purpose of convening the panel, correct?</p> <p>21 A. The whole purpose of the panel</p> <p>22 information about the applicant so that</p> <p>23 determine whether or not we recommend</p> <p>24 or not.</p> <p>25 Q. Right. And that's what I'm saying</p>	<p>1 Q. And who was "we"? Who is "we"?</p> <p>2 trying to get I'm -- you know, typically we go back to</p> <p>3 whoever was with me during the time that we</p> <p>4 interviewed Mr. White, who -- the gentlemen -- the</p> <p>5 we know he of us would go back in -- or two of us, how</p> <p>6 many it was, would go back in and talk to the sheriff</p> <p>7 Q. But you don't remember who "we" was?</p> <p>8 A. No. I don't remember.</p> <p>9 Q. In this particular one, how many -- how</p> <p>10 White office has have you recommended in -- or deputies have</p> <p>11 you recommended not to be hired?</p> <p>12 A. I don't have a number. I've been doing</p> <p>13 then, if I -- I couldn't -- there's no -- I have no</p> <p>14 of knowing. There have been a lot we recommended</p> <p>15 hire. There have been a lot we've recommended</p> <p>16 hire.</p> <p>17 Q. Give me just a roundabout number as in</p> <p>18 recommended five?</p> <p>19 A. It's -- if you could somehow tally up the</p> <p>20 amount of applications we've had since 1997 until</p> <p>21 this day in office, I mean, I cannot put a number on it</p> <p>22 because I have no way of formulating how many. I</p> <p>23 to justify making up something.</p> <p>24 Q. So in 1997, you were in investigation?</p> <p>25 A. I sat on panels in 1997 also?</p>
Page 31	Page 33
<p>1 Did this panel recommend Mr. White for</p> <p>2 hiring?</p> <p>3 A. No. Not to the sheriff.</p> <p>4 Q. Okay. So what did the panel do,</p> <p>5 A. We recommended not to hire him.</p> <p>6 Q. You recommended the sheriff not to hire</p> <p>7 Mr. White?</p> <p>8 A. That's correct.</p> <p>9 Q. And the sheriff went ahead and hired him,</p> <p>10 anyhow?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Okay. Can you tell me about that</p> <p>13 recommendation.</p> <p>14 A. I think vaguely we discussed that he had</p> <p>15 been fired for so many -- from previous positions that</p> <p>16 he had, and I think that was the reason why we</p> <p>17 recommended not to hire him.</p> <p>18 Q. Did you--all put that recommendation</p> <p>19 writing?</p> <p>20 A. I think we walked down to the sheriff and</p> <p>21 talked to him.</p> <p>22 Q. And what did the sheriff say when you said</p> <p>23 it?</p> <p>24 A. He said, "Unless he's killed the president,</p> <p>25 I'm going to hire him."</p>	<p>1 A. I did. I did. As a matter of fact, the</p> <p>2 forms you see, because it was so -- done so</p> <p>3 haphazardly before, I created these forms. I'm talking</p> <p>4 that started the process of coming in and going</p> <p>5 through -- sitting down and going through a process</p> <p>6 when I got hired and back under -- not Sheriff</p> <p>7 White but the other sheriff. You would walk in,</p> <p>8 he would shake your hand when you were hired.</p> <p>9 I was hired that way. I was hired with</p> <p>10 even putting an application in. He said, "You're</p> <p>11 hired." I came back to get an application after</p> <p>12 that process, and I thought that wasn't how the process</p> <p>13 to be. So this particular format you see here is</p> <p>14 that he had I came up with that.</p> <p>15 positions that So I've been doing that type work since</p> <p>16 1997.</p> <p>17 Q. Okay. Okay. So when you say -- you're</p> <p>18 talking about the letter on the sheriff's letterhead</p> <p>19 A. Yes.</p> <p>20 Q. Not the court form?</p> <p>21 A. No, not the court form.</p> <p>22 Q. Okay. But the court form requesting the</p> <p>23 background would have been part of the hiring process</p> <p>24 the president, Like, if you're referring to the AOC 31</p> <p>25 form --</p>

Page 34	Page 36
<p>1 Q. Yes.</p> <p>2 A. Right. This is something that</p> <p>3 I have been at the sheriff's office's where there</p> <p>4 wasn't even done.</p> <p>5 Q. Okay.</p> <p>6 A. That's why I -- the process had</p> <p>7 Q. Okay. Can -- when did that process -- when</p> <p>8 did the process of seeking a criminal background check</p> <p>9 start? Do you recall that?</p> <p>10 A. Well, you have to -- you have to</p> <p>11 somebody's criminal background check. Training</p> <p>12 standards won't allow you to submit an applicant</p> <p>13 without a background check being done. So the</p> <p>14 background had to be done in some form or</p> <p>15 The way in which it was done, you</p> <p>16 early on, even -- even through me, you would</p> <p>17 clerk up and say, "This is me. Send me</p> <p>18 you've got on this person right here," and</p> <p>19 do it. But then over time, that didn't</p> <p>20 didn't wash. So over time, we had to</p> <p>21 it in writing and sign it as the request,</p> <p>22 they would send us the information.</p> <p>23 Q. Was that a --</p> <p>24 A. The way that started, I don't</p> <p>25 know in the beginning, it wasn't that way.</p>	<p>1 A. I'm sorry?</p> <p>2 we done, but</p> <p>3 point?</p> <p>4 A. He became sheriff in '06, I think. Hol</p> <p>5 '06. And he stopped being sheriff in 2018.</p> <p>6 Q. Okay. So you said it wasn't the first</p> <p>7 Can you name an instance in which he di</p> <p>8 recommendation?</p> <p>9 A. He didn't take my recommendation for</p> <p>10 Mr. White.</p> <p>11 Q. Aside from Mr. White.</p> <p>12 A. Oh, yes. There was a young lady named</p> <p>13 Kimberly Gregory from Durham.</p> <p>14 MR. GEIS: You can't talk about any</p> <p>15 you know, particular person.</p> <p>16 THE WITNESS: Oh, okay. All right.</p> <p>17 Well, there was a young lady who was fr</p> <p>18 Durham Police Department that I recommended</p> <p>19 the panel recommended to hire, and he didn't</p> <p>20 formally request, which stood out. The reason why that</p> <p>21 stands out in my mind is because her training</p> <p>22 portfolio was really, really thick. It was</p> <p>23 thick as this right here, and I thought she</p> <p>24 know, but have been a good hire.</p> <p>25 BY MS. ROBINSON:</p>
Page 35	Page 37
<p>1 Q. Was that due to a change in policy of</p> <p>2 training standards or policy of Vance County?</p> <p>3 A. No. That was just my own personal</p> <p>4 the bull by the horns and doing it because I</p> <p>5 like the way it was done.</p> <p>6 Q. Okay. Okay. So Mr. White was</p> <p>7 recommended but was hired.</p> <p>8 Do you recall Mr. White when he started at</p> <p>9 the sheriff's department? Do you recall any -- any</p> <p>10 specifics about his employment?</p> <p>11 A. No. Once I -- because he's not</p> <p>12 division, I don't -- I wouldn't see him</p> <p>13 day-to-day basis, or I wouldn't interact</p> <p>14 day-to-day basis. You know, I -- once</p> <p>15 paperwork is gone, I don't -- you know,</p> <p>16 anything more in terms of directly interacting</p> <p>17 him on a day-to-day basis. I don't have</p> <p>18 I recall that I could add.</p> <p>19 Q. Okay. How did that make you feel</p> <p>20 sheriff did not take your recommendation?</p> <p>21 A. It didn't make me feel any kind</p> <p>22 That -- it wouldn't be the first time he</p> <p>23 my recommendation.</p> <p>24 Q. Okay. How long had he been the sheriff at</p> <p>25 that point?</p>	<p>1 Q. Okay. So I want to -- I want to unders</p> <p>2 your role a little more. I know you sat on these</p> <p>3 hiring panels, and that was probably one aspect o</p> <p>4 your role at the time of Mr. White's employment,</p> <p>5 particular. And I've asked you some about it, bu</p> <p>6 not would -- you said that you were in a different</p> <p>7 division.</p> <p>8 What division were you in?</p> <p>9 I was in charge of the administration</p> <p>10 division and the divisions that are under me.</p> <p>11 coming Q. So what does "administrative" mean,</p> <p>12 a "administrative division"?</p> <p>13 An a I'm responsible for records, like for t</p> <p>14 all the records, gun permits, concealed handgun permi</p> <p>15 don't have papers, criminal investigations, evidence,</p> <p>16 facting kind background information, fingerprints. I was in c</p> <p>17 anything out of that division.</p> <p>18 Q. So, Mr. Bullock, walk me through, like,</p> <p>19 typical day in your life when -- at the time of</p> <p>20 Mr. White's employment.</p> <p>21 of way. A. I don't know. I don't know if I can sa</p> <p>22 didn't take day. I don't know if --</p> <p>23 MR. GEIS: Objection. Relevance.</p> <p>24 BY MS. ROBINSON:</p> <p>25 Q. You can answer the question. Please an</p>

Page 38	Page 40
<p>1 the question.</p> <p>2 A. I would come to work, and I would do my duties as -- you know, I would go over the reports. It was there -- there were times that I might not come to work because I was out on homicide the night before.</p> <p>7 Q. What type of reports would you go over?</p> <p>8 A. I would go over the incident reports.</p> <p>9 Q. Okay. And what is an incident report?</p> <p>10 A. It's reports generated by officers when they're assigned a department number to an incident, a particular record.</p> <p>13 Q. By "incident" and "record," what does that mean -- does it mean something went wrong? something went right? What does that mean, an "incident report"?</p> <p>17 A. It means that the sheriff's department was involved in something that required a report to be written. The reports could be on forms that are called investigation incident reports. The reports start with something on a form called operation reports. It's just -- they have numbers that you can see, you know, who was assigned to it. Information was generated through 911, that could be trackable and kind of figure out what</p>	<p>1 incident report for that. I don't know.</p> <p>2 Q. You wouldn't have to do that at all, right?</p> <p>3 A. That's not part of your job. You know, when is that? If debris was in the road big enough to impede traffic, then, yeah, you would be expected to stop and get that stuff out of the way and move it over to the side.</p> <p>8 Q. Okay.</p> <p>9 A. You wouldn't write a report for that.</p> <p>10 Q. Okay. So you mentioned incident report?</p> <p>11 A. You mentioned use of force.</p> <p>12 Tell me about your involvement in force engagements or investigations.</p> <p>13 A. Some use-of-force reports would come through the days that I was working. I would take a look at them. I would try to contact the person's supervisor and sort of engage what was going on with them. And then if I felt that it was necessary for an administration investigation, I would start an administrative investigation.</p> <p>21 Q. So would all use-of-force reports go through you?</p> <p>22 A. No. Not necessarily. They would -- depending on who -- you know, how extensive they are. Something in which someone was hurt, that would</p>
Page 39	Page 41
<p>1 happened, what went on. And the deputies would write those reports. And in the mornings, I would look at those.</p> <p>4 Q. Are there any instances in which an incident report is required to be written?</p> <p>6 A. Yes.</p> <p>7 Q. What are those instances?</p> <p>8 A. A murder, you have to write an incident report. A break-in, you got to write an incident report. A rape, you got to write an incident report. A chase, you got to write an incident report. Use of force, you got to write an incident report. If you got bit by a dog, you got to write an incident report. There's a lot more than I could probably name.</p> <p>16 Q. Okay.</p> <p>17 A. Those are just examples.</p> <p>18 Q. Okay. And what are examples of when you don't have to write an incident report?</p> <p>20 A. I don't know how to answer that question. What are examples of when you don't? I don't know what that I can answer that question. It's like you're driving down the road and you see some trash on the road and you get out of your car and you get the trash out of the road, you wouldn't have to write an</p>	<p>1 incident report. Something that you drew your gun and you would do nothing else but drew your gun, that wouldn't come to me.</p> <p>3 Q. Okay. So officers are required to report when they draw their gun?</p> <p>5 A. Yes.</p> <p>7 Q. And what would that -- that would be a use-of-force report?</p> <p>8 A. Use-of-force report and an investigation incident report.</p> <p>11 Q. Okay. And so you said the typical procedure would be for you to contact the person's supervisor?</p> <p>12 A. Yeah. I would have a conversation about it. The officer writes, and I want to kind of get a feel and let the supervisor know what was going on. I want to make sure the supervisor knew, and it may be something as simple as a telephone call. And depending on when you were working, I just may have them come to my office. I may walk up to where they are and just say, "Hey, do you know about this?"</p> <p>22 Q. Okay. And what would you do next typically?</p> <p>23 A. If it rose to the level of an administrative investigation, I would start an administrative investigation.</p>



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

Page 42	Page 44	Page 44
<p>1 Q. And that would consist of what 2 what an administrative investigation is. 3 A. I would gather information concerning the 4 particular incident, whether it be witness statements 5 or -- it may be having another officer go out and talk 6 to a person while I do something else. 7 will come down to talk to the officer that was the 8 subject of that particular use of force. 9 Q. And, typically, how long does those 10 investigations take to be resolved? 11 A. There's no typical. It depends on the 12 circumstances. 13 Q. Okay. 14 A. So I can't tell you what -- how long 15 typically they last, and I don't have a working frame 16 of, you know, how long these things take. 17 have that committed to any type of memory. 18 Q. On average? 19 A. You know, we've had officers to 20 people, so that takes a little bit longer 21 officers to do something a lot less than 22 and they will be a little shorter, but 23 working memory of how long they take. 24 Things can be delayed by getting 25 information, and things can be delayed</p>	<p>1 Explain And the recommendation would be to -- w 2 this is? 3 It could be to exonerate. It could be 4 statements with pay. It could be to demote. It cou 5 go out and talk to them their services are no longer needed. 6 Eventually, it was there a particular continuum? So, 7 as the like, a -- if -- say an officer had -- Offic 8 had been involved in an incident report before, a 9 use-of-force report before, was there any type of 10 escalation, any type of process? 11 A. I don't know that I understand. 12 Q. Were there -- were there steps to the 13 consequences or -- to your recommendation? Did t 14 progressively get worse? 15 Oh, did the recommendation steps get wo 16 I based on what they did before? 17 Q. Yes. 18 A. No. I just -- my recommendation is bas 19 the incident I had before me. 20 We had Q. Okay. So it could be a first-time inci 21 that if you felt like it was egregious enough, th 22 don't have a That's correct. 23 Q. So I want to -- are you familiar with t 24 you're familiar with the use-of-force policy, cor 25 somebody A. not I don't have it to memory now because I</p>	
Page 43	Page 45	Page 45
<p>1 working or somebody in place. I don't 2 don't have a working memory of what -- how long 3 something like that would take. 4 Q. Can you tell me about the steps? Was there 5 any set number of steps that you would take from 6 report to completion? 7 A. I don't know that I understand 8 mean by "steps"? 9 Q. Any way in which you would operate to 10 investigate a case? Would you convene a panel? 11 you -- you know, you talked about meeting with 12 supervisor. 13 A. So, no, I wouldn't convene a panel. I 14 would, again, interview any witnesses, interview this 15 victims. I would gather data from 911. 16 gather data from the officer. I would talk to the 17 officer. Any documentation that's relevant to 18 whatever happened, I would gather those documents. 19 Q. Okay. And would you then make a 20 recommendation to the -- 21 A. After I had finished everything 22 to do, then I would make a recommendation. 23 Q. And who would you make a recommendation to? 24 A. To the sheriff. 25 Q. To the sheriff?</p>	<p>1 have haven't looked at it in a long, long time. So -- 2 how long MS. ROBINSON: Michael, can we get the 3 use-of-force policy pulled up. 4 Was there ROBINSON: 5 Take a moment to look over it, if you w 6 A. Okay. 7 What do you Okay. Can you read the name at the bot 8 of this policy, Vance County. 9 A. Vance County Sheriff's Office Policy Ma 10 Okay. And then can you identify this 11 policy. 12 A. Like, read from the bottom line? 13 Q. No. At the directive. Which directive 14 in this? Look in the top right-hand corner, Mr. Bul 15 I would A. Oh, I can't see the top right-hand corn 16 talk to the Q. Oh, you don't have it in front of you? 17 A. Directive B.9. 18 documents Q. Okay. And what's the effective date of 19 a policy? 20 A. 7-15-2009. 21 that I know And so it's safe to say this is Vance 22 County's use-of-force policy? 23 (The witness nodded head.) 24 Q. Have you had a chance to review the che 25 agents section of this policy on Page 1?</p>	

Page 46	Page 48
<p>1 MR. GEIS: Is this an exhibit that BY MS. ROBINSON: 2 MS. ROBINSON: This is Exhibit 2 Number 3 Q. Mr. Bullock, you've had an opportunity 3 MR. GEIS: Okay. It would be helpful to review this document? 4 mark these exhibits. 4 A. Yes, ma'am. 5 MS. ROBINSON: They will be. 5 You know, Q. Okay. And can you define what this doc 6 honest to God, you-all didn't mark 6 any exhibits. 7 I will say that. 7 A. It's the documents that contained some 8 MR. GEIS: It would be helpful to information from my administrative investigation 9 exhibits so we know what we're talking 9 Deputy White's actions pertaining to use of force 10 MS. ROBINSON: We will. We will. 10 against Latwanya Oliver. 11 (Exhibit 3 was marked for identification.) MS. ROBINSON: Okay. Let the record re 12 MR. GEIS: If you could put Number 3 on the 12 that the witness has identified what should 13 bottom of that. Do you need a pen 13 marked as Exhibit 4. 14 THE WITNESS: Okay. 14 (Exhibit 4 was marked for identification.) 15 BY MS. ROBINSON: 15 BY MS. ROBINSON:</p>	
<p>16 Q. Have you had a chance to review 16 the chemical Do you recall this incident? Do you re 17 agents? 17 drafting this document? 18 A. Yes, ma'am. 18 A. Yes. 19 Q. And do you mind reading that 19 second bullet? Okay. Can you explain to me the proces 20 A. "Prior to issuance of Oleores 20 Caps which you employed when conducting this investiga 21 Spray (OC Spray), all deputies shall receive training I gathered up the use-of-force report, 22 in its use, which will include instruct 22 on an incident report, the information that was obtained 23 application to afford the deputy an under 23 standing of Ms. Oliver, the information that was obtained 24 the effects. Any use of OC Spray other 24 than from the hospital. I listened to the 911 tapes, 25 training situation or spraying of anima 25 fore recordings. I conducted interviews.</p>	
Page 47	Page 49
<p>1 self-protection shall be reported, as re 1 quired by Q. This So Ms. Oliver filed a complaint? Is th 2 policy." 2 what you're saying? 3 Q. Okay. And as someone who evaluates use 3 of Yes. Ms. Oliver filed a complaint. 4 force, what does that sentence mean -- 4 on those Q. Okay. When did she -- do you recall wh 5 sentences mean? 5 she filed that complaint, that written complaint? 6 A. That you can only carry the made that the I don't know the day. 7 sheriff's office issues you, and you have 7 to have Q. On the date of the incident, the date a 8 proof that you've been trained, and you 8 can't the incident? 9 animals. 9 A. It was within that same week, but I don 10 Q. Okay. Okay. I want to -- I'm going to come 10 when she did it. 11 back to this policy, so just kind of leave 11 it out Q. If Okay. So after she filed a written 12 you will. 12 complaint, what occurred next? How was this comp 13 But for now, I want to talk some 13 about the 14 incident that you investigated in terms 14 of Mr. White. She may have talked to Captain Watkins. 15 Okay? 15 would have talked to Mr. White. I talked to his 16 MS. ROBINSON: Michael, can we get super 16 supervisors. I gathered the documents that I jus 17 report up. 17 mentioned before. 18 BY MS. ROBINSON: 18 Q. So who do you recall speaking to? 19 Q. Can you take a minute and review that 19 A. I recall speaking to Mr. White. I reca 20 document, please. 20 speaking to Lieutenant Goolsby, Sergeant Welborn, 21 MS. ROBINSON: Chris, while he's 21 Captain Watkins, Ms. Oliver. 22 that document, I'm just going to go 22 get a refill In order to get the reports from 911, I 23 on coffee. 23 would have spoken to somebody at 911, but I don't 24 MR. GEIS: Okay. 24 who. I'm sure at some point in time, I talked to 25 (Recess in proceedings from 11:50 to 25 1:55 Sheriff.</p>	

Page 50	Page 52	
<p>1 Q. Let's go to -- I think it should be Page 2 2 and 3 of that report. I'm going to come back and ask 3 you questions about these conversations, but I want 4 you to go to Page 2 and 3 of the report. It 5 illustrates what you based your decision on. 6 Do you see Mr. White's statement listed? 7 A. It seems like the first -- are you referring 8 to when he first said, "All hell broke loose?" 9 Q. No. Page 2 and 3 where it says 10 "illustrations," your conclusion. 11 A. All right. 12 Q. Right above your conclusions. 13 A. Okay. And what was the question? 14 Q. The question is, this isn't -- these are 15 illustrations of which you based your decision on, 16 correct? 17 A. Yes. 18 Q. Okay. Do you see Mr. White's statement 19 listed? 20 A. Yes. 21 Q. Where is Mr. White's statement? 22 A. It's -- what he wrote was in the use of 23 report -- use of -- I mean the incident report 24 1801-3870 and a use-of-force report. 25 Q. Okay. So are those the investigations that</p>	<p>1 Q. Let's go to -- I think it should be Page 2 2 and 3 of that report. I'm going to come back and ask 3 you questions about these conversations, but I want 4 you to go to Page 2 and 3 of the report. It 5 illustrates what you based your decision on. 6 Do you see Mr. White's statement listed? 7 A. It seems like the first -- are you referring 8 to when he first said, "All hell broke loose?" 9 Q. No. Page 2 and 3 where it says 10 "illustrations," your conclusion. 11 A. All right. 12 Q. Right above your conclusions. 13 A. Okay. And what was the question? 14 Q. The question is, this isn't -- these are 15 illustrations of which you based your decision on, 16 correct? 17 A. Yes. 18 Q. Okay. Do you see Mr. White's statement 19 listed? 20 A. Yes. 21 Q. Where is Mr. White's statement? 22 A. It's -- what he wrote was in the use of 23 report -- use of -- I mean the incident report 24 1801-3870 and a use-of-force report. 25 Q. Okay. So are those the investigations that</p>	<p>1 Q. Let's go to -- I think it should be Page 2 2 and 3 of that report. I'm going to come back and ask 3 you questions about these conversations, but I want 4 you to go to Page 2 and 3 of the report. It 5 illustrates what you based your decision on. 6 Do you see Mr. White's statement listed? 7 A. It seems like the first -- are you referring 8 to when he first said, "All hell broke loose?" 9 Q. No. Page 2 and 3 where it says 10 "illustrations," your conclusion. 11 A. All right. 12 Q. Right above your conclusions. 13 A. Okay. And what was the question? 14 Q. The question is, this isn't -- these are 15 illustrations of which you based your decision on, 16 correct? 17 A. Yes. 18 Q. Okay. Do you see Mr. White's statement 19 listed? 20 A. Yes. 21 Q. Where is Mr. White's statement? 22 A. It's -- what he wrote was in the use of 23 report -- use of -- I mean the incident report 24 1801-3870 and a use-of-force report. 25 Q. Okay. So are those the investigations that</p>
<p>1 you had with Mr. White? 2 A. Are those the what? 3 Q. Investigations that you had with Mr. White. 4 A. I don't understand your question. 5 Q. Did you have direct conversations with 6 Mr. White, or did you base it on these use-of-force 7 reports and the incident report? 8 A. Yes. I had direct conversations with 9 Mr. White. 10 Q. But your conclusion wasn't based on that 11 direct conversation? 12 A. It was based on everything I had gotten, 13 either through talking or whatever was written 14 was based on everything that I compiled in order to 15 produce this report and make a recommendation. 16 Q. But it's not noted on this document is that 17 fair to say? 18 A. Is what not noted? 19 Q. Your conversations with Mr. White. 20 A. It's not fair to say because I quoted 21 the things he said. 22 Q. Okay. So let's go back to your statements 23 with -- or your conversations with, you said, 24 Mr. White. Let's start with Mr. White. 25 How did that conversation go?</p>	<p>1 A. I don't know that I can summarize it. 2 don't know verbatim. You know, he basically saw 3 the day before. He turned around on it. 4 think he ran the registration. He confronted the 5 her about her speeding. She became verbal with 6 use-of-force. I think she -- he got back out, 7 to the office. He realized there was warrants. 8 went to the house to try to serve the warrants or 9 to the house to try to make contact with her. I 10 called it an investigation at first. He did not 11 make contact. His shift ended. 12 had gotten, He came back the following shift or the 13 following -- the next day or night. He went there 14 in order to check on the warrants. She seemed cooperative at 15 first. He tried to put the handcuffs on her. I 16 something about she wouldn't let him get 17 handcuffs on her, and he -- he said he performed 18 takedown maneuver. 19 I asked him what takedown maneuver he 20 performed, and he couldn't tell me. 21 Q. And how long did this conversation last 22 I don't recall. 23 Q. Was it a half day? Was it an hour 24 conversation? 25 When did you</p>	<p>1 A. I don't know that I can summarize it. 2 don't know verbatim. You know, he basically saw 3 the day before. He turned around on it. 4 think he ran the registration. He confronted the 5 her about her speeding. She became verbal with 6 use-of-force. I think she -- he got back out, 7 to the office. He realized there was warrants. 8 went to the house to try to serve the warrants or 9 to the house to try to make contact with her. I 10 called it an investigation at first. He did not 11 make contact. His shift ended. 12 had gotten, He came back the following shift or the 13 following -- the next day or night. He went there 14 in order to check on the warrants. She seemed cooperative at 15 first. He tried to put the handcuffs on her. I 16 something about she wouldn't let him get 17 handcuffs on her, and he -- he said he performed 18 takedown maneuver. 19 I asked him what takedown maneuver he 20 performed, and he couldn't tell me. 21 Q. And how long did this conversation last 22 I don't recall. 23 Q. Was it a half day? Was it an hour 24 conversation? 25 When did you</p>

Page 54	Page 56
<p>1 Q. Was Mr. White the first person who you spoke 2 to about this incident? 3 A. No. 4 Q. Who was the first person? 5 A. It might have been Sergeant Welborn. I don't remember what I said. You know, again, a 6 Lieutenant Goolsby. 7 Q. What did they tell you? 8 A. I don't know. I don't remember what they said. You know, they said. 9 told me. I have the incident report. You know, they said. 10 as a standard practice, I checked with the supervisor. Got you. Well, you said you spoke to 11 to make sure they were aware of it and I remember what they told me. 11 but Mr. Watkins. 12 13 Q. Was it an in-person meeting or a phone call? 14 A. I don't remember. 15 Q. You don't remember? You don't remember for 16 either of them? 17 A. No. At some point in time, they were both. Okay. You said you had a conversation 18 in my office talking, but whether or not that was the first time or not, I don't know. And they were in the office. Yes. 19 first time or not, I don't know. And they were in the office. Yes. 20 office talking when Mr. White was in the office. When Mr. White was in the office with me. I mean, they were in the office present when 21 me. I mean, they were in the office present when Mr. White was in the office with me. 22 Mr. White was in the office with me. 23 Q. Okay. So your testimony is that Welborn and 24 Goolsby were -- Welborn and Goolsby and Mr. White 25 spoke to them all at once?</p>	<p>When you say "they," who are you referring to? 2 to? 3 Q. Welborn, Goolsby. 4 A. No. I don't remember what they said to me. I don't remember what I said. You know, again, a 5 part of my -- during this investigation, I always 6 checked with the supervisors to make sure they are 7 aware of what's going on, but I don't know exactly 8 what they said. 9 You know, they said. 10 Got you. Well, you said you spoke to 11 but Mr. Watkins. 12 What did that conversation -- 13 I don't remember the details, but what 14 I remember about Mr. Watkins' conversation is he was 15 initially spoke to Ms. Oliver, and that's 16 I remember about that. 17 Okay. You said you had a conversation 18 with Sheriff White? 19 Yes. 20 Do you recall that conversation? 21 A. As I complete the investigation, I let 22 know that I've completed it. I let him know I 23 completed it, and then I turn it over to him, and 24 he takes it. 25 Q. So that was the extent of your conversation?</p>
Page 55	Page 57
<p>1 A. At some point in time, I was 2 point in time, they were in my office together. I know that some 3 point in time. That's the point in time that a part of my standard operating procedure to do 4 actually spoke to Goolsby and Welborn with things. But when I'm done, I let him know that I 5 Mr. White being in my presence. Whether that was on the phone or in my office or in their office, I don't 6 the phone or in my office or in their office, I don't recall when. 7 don't recall when. 8 Q. What did you say when you spoke to them 9 outside of Mr. White's presence? 10 A. I don't recall what I said. 11 Q. Can you tell me what you do recall about 12 this investigation. Just kind of walk me through it. 13 A. I remember having knowledge of the incident. Okay. Well, we spoke generally. I'm 14 report. I remember having seen a statement from what you can recall you said to Sheriff White, what 15 Ms. Oliver. I remember talking to Captain Welborn. I can remember talking to Lieutenant Goolsby. I can remember 16 can remember talking to Lieutenant Goolsby. I can remember talking to Sergeant Welborn. I can remember 17 remember talking to Sergeant Welborn. I can remember talking to Lieutenant Goolsby. I can remember 18 talking to Mr. White in my office with Goolsby and Sergeant Welborn, and I can remember 19 Goolsby and Sergeant Welborn, and I can remember gathering the documents for this report. 20 gathering the documents for this report. 21 And I remember taking -- once I finished the investigation is. You know, I pointed out what 22 taking the report to the sheriff with the recommendation is as it reads. 23 recommendation. 24 Q. Okay. But you can't remember what you said 25 to them or what they said to you?</p>	<p>1 A. When I do these investigations, I let him know that I was doing it, because it's 2 part of my standard operating procedure to do that. I let him know that I was doing it, because it's 3 that a part of my standard operating procedure to do that. I let him know that I was doing it, because it's 4 things. But when I'm done, I let him know that I was doing it, because it's 5 that was on the phone or in my office or in their office, I don't recall when. 6 the phone or in my office or in their office, I don't recall when. 7 talking to him. And I tell him what the recommendation is, and then I leave. I didn't have 8 recommendation is, and then I leave. I didn't have anything to do with it after that -- 9 anything to do with it after that -- 10 Okay. 11 -- except this report. 12 Okay. Well, we spoke generally. I'm talking to him. And I tell him what the recommendation is, and then I leave. I didn't have 13 the time to speak more specifically about this incident. 14 what you can recall you said to Sheriff White, what you can recall you did. 15 you can recall you did. 16 A. I recall letting him know that I've completed it, and I recall giving it to him. 17 I can remember talking to Lieutenant Goolsby. I can remember talking to Sergeant Welborn. I can remember 18 talking to Mr. White in my office with Goolsby and Sergeant Welborn, and I can remember 19 Goolsby and Sergeant Welborn, and I can remember gathering the documents for this report. 20 gathering the documents for this report. 21 And I remember taking -- once I finished the investigation is. You know, I pointed out what 22 taking the report to the sheriff with the recommendation is as it reads. 23 recommendation. 24 Q. Okay. And what did he say? 25 I don't know what he said. Q. You don't know?</p>

Page 58	Page 60	
1 A. I don't remember staying around to talk 2 about anything.	2 any training that law enforcement officers have. 3 recommended it trained to slam people down on the grou	standards w
3 Q. So you recommended that -- you recommended 4 that Deputy White be terminated, correct?	4 Q. Okay. Tell me about some of those subj 5 control techniques.	those subj
5 A. I don't use those terms, so that's 6 correct.	6 A. He could have done an arm bar takedown. 7 He could have done a leg sweep. He could have done	takedown.
7 Q. What term did you use? Well, let's read the 8 recommendation. So pull up the document, please.	8 please. wrist come-along. 9 Q. Can you explain to me what's an arm bar	He could have done
9 Let's read your -- can you, please, read your 10 recommendation.	10 technique. 11 Captain A. Basically, when you have a person by th	an arm bar
11 A. "It is the recommendation of Captain 12 Watkins, Lieutenant Goolsby, Sergeant Weldon	12 Watkins, Lieutenant Goolsby, Sergeant Weldon 13 investigator officer that Deputy Justin White	person by th
14 service with the Vance County Sheriff's Office 15 longer needed."	15 Office cuffs them. 16 Q. Okay. So the effect is termination, right?	actually
16 Q. Okay. So the effect is termination, right? 17 A. Yes.	17 A. Yes, I do. He slammed her down on the 18 Q. Okay. And can you explain to me how you	arm straight, you then kind of
18 Q. Okay. And can you explain to me how you 19 reached this recommendation, this conclusion,	19 slam anybody. 20 Q. Who said Mr. White slammed Ms. Oliver t	The arm bar technique doesn't require yo
20 A. He slammed the victim and broke her arm. 21 Q. So what did you base your decision on? What	21 How did you make that conclusion? How d 22 you conclude that?	ground and
22 rule? What policy? 23 A. Use-of-force, Directive B.9I.	23 A. Ms. Oliver said that Mr. White slammed 24 Q. And how did you come to the conclusion that	ground.
24 Q. And how did you come to the conclusion that 25 he violated that policy?	25 Q. So I asked you earlier about how many	ground.
Page 59	Page 61	
1 A. He slammed the lady to the ground and 2 her arm.	1 use-of-force investigations have you conducted. 2 said very many, correct?	use-of-force
3 Q. Okay. Earlier you testified that you 4 investigated brandishing and actual shootings before,	4 A. Yes. 5 Do you substantiate the majority of the	A. Yes.
5 correct? 6 A. That's correct.	5 based on a suspect's testimony or statement? 6 A. I don't know. I don't have a working m	Do you substantiate the majority of the
7 Q. All right. Let's talk about some of those 8 Do you always recommend departure or	8 unsubstantiated. I have not kept -- there have b 9 separation -- let's call it separation since you don't	I don't have a working m
9 separation -- let's call it separation since you don't 10 like "termination" -- separation from employment when	10 no have been substantiated. Like, I don' 11 know the -- you know, the difference. I don't kn	unsubstantiated. I have not kept -- there have b
11 someone is injured? 12 A. I don't always recommend it.	12 the tally. 13 Q. Okay. When do you recommend separation?	no have been substantiated. Like, I don'
13 Q. Okay. When do you recommend separation? 14 A. When I feel that they violated policy.	14 investigation with anyone other than those person 15 you identified?	the tally.
15 Q. You just feel it? 16 A. Sorry?	16 A. Yes. 17 Q. You just feel it? You just get a feeling,	investigation with anyone other than those person
17 Q. You just feel it? You just get a feeling, 18 "I'm --"	18 Who? 19 A. I discussed it with Mr. Geis, and I	You just get a feeling,
19 A. No. I didn't say "feeling." 20 they -- when I see that they violated policy.	20 I discussed it with Lawrence Bullock. 21 Q. I don't want to know what you told Mr.	I discussed it with Mr. Geis, and I
21 Q. Okay. And in your opinion, what could 22 Mr. White have done differently?	22 But what discussions did you have with 23 Bullock?	I don't want to know what you told Mr.
23 A. He certainly shouldn't have 24 broke her arm. He could have used his	24 A. After this suit came out, you know, he 25 used called me and said, "Hey, you know, J.J., why are	But what discussions did you have with
25 get her under control, or he could have		After this suit came out, you know, he

<p style="text-align: right;">Page 62</p> <p>1 suing us?"</p> <p>2 I said, "For what?"</p> <p>3 He said, "Well, you talked about</p> <p>4 talked about this." But I'm not -- you</p> <p>5 know what thing he was saying, because he</p> <p>6 get it at the same time he got it. I got</p> <p>7 later -- you know, I live out of town, so</p> <p>8 before I got it, before they got it.</p> <p>9 So he was wherever before I got</p> <p>10 discussed it in that manner. That's it</p> <p>11 Q. What did you-all say?</p> <p>12 A. "Hey, we're being sued. We got</p> <p>13 talk --" You know, I think we -- arrange</p> <p>14 made for us to meet with our attorney.</p> <p>15 That's about the gist of it.</p> <p>16 Q. Do you recall the length of that</p> <p>17 conversation?</p> <p>18 A. I don't.</p> <p>19 Q. Do you recall --</p> <p>20 A. It would -- it would -- no.</p> <p>21 that conversation.</p> <p>22 Q. How many times have you-all discussed this</p> <p>23 suit since?</p> <p>24 A. The times we've discussed the</p> <p>25 first time he told me about it is how many times</p>	<p style="text-align: right;">Page 64</p> <p>1 force.</p> <p>2 Q. Deadly force?</p> <p>3 A. Uh-huh.</p> <p>4 Q. But even if it's just brandished, you s</p> <p>5 have to report it?</p> <p>6 A. No. Because the deputy wears a uniform</p> <p>7 that gun is seen all the time, so that -- to see i</p> <p>8 simply wouldn't be something you have to report.</p> <p>9 Q. Okay.</p> <p>10 A. Just if you see a gun. But if you were</p> <p>11 put your hands on it and draw it, then that would</p> <p>12 something you would have to report.</p> <p>13 Q. Okay. Okay. And that was something th</p> <p>14 would be run by you also?</p> <p>15 A. Say that again.</p> <p>16 Q. That report would be run through you in</p> <p>17 cases or in certain cases?</p> <p>18 A. What report?</p> <p>19 Q. If an officer drew a gun.</p> <p>20 don't recall Not necessarily.</p> <p>21 Q. Not -- okay. So we talked about this</p> <p>22 discussing them. So when are soft hands to be used?</p> <p>23 Because you said you got a presence, you had a ve</p> <p>24 you have soft hands, pepper spray, force, and dea</p> <p>25 force.</p>
<p style="text-align: right;">Page 63</p> <p>1 I've met with him and Mr. Geis and Mr.</p> <p>2 White. I don't know how many times that</p> <p>3 Q. Okay.</p> <p>4 A. All the discussions have been</p> <p>5 time.</p> <p>6 Q. Okay. Okay. And those are the only persons</p> <p>7 who you discussed this incident with?</p> <p>8 A. Those are the only persons I</p> <p>9 incident with.</p> <p>10 Q. Okay. Are you familiar with the</p> <p>11 use-of-force continuum?</p> <p>12 A. Vaguely. Again, over time, I</p> <p>13 that stuff has faded out of my memory.</p> <p>14 it to you exactly. I know it, and I recognize it.</p> <p>15 I can see it. I recognize it.</p> <p>16 Q. Okay. I don't want you to quote it</p> <p>17 I just kind of want you to explain the</p> <p>18 someone who made use-of-force calls.</p> <p>19 A. The continuum starts with presence and</p> <p>20 verbal and then soft hands, hard hands.</p> <p>21 other, like, techniques like mace and pepper spray,</p> <p>22 and then you have deadly force.</p> <p>23 Q. Where does a firearm fit in a</p> <p>24 the continuum?</p> <p>25 A. If it's discharged, it would</p>	<p style="text-align: right;">Page 65</p> <p>1 and Sheriff Soft hands would be the -- grabbing</p> <p>2 somebody's wrist or hand, placing their hands beh</p> <p>3 their back and handcuffing them. That would be a</p> <p>4 example of soft hands. Sometimes deputies place</p> <p>5 handcuffs on the front of somebody. That would b</p> <p>6 persons. Soft hands could be you're guiding</p> <p>7 somebody, just holding their shoulder and just wa</p> <p>8 discussed them. That could be soft hands.</p> <p>9 Q. Okay. And according to the continuum,</p> <p>10 the hands is less intrusive than lethal weapons, such</p> <p>11 batons and Tasers and pepper spray; is that corre</p> <p>12 A. What's the question?</p> <p>13 Q. Are soft-hand techniques -- according t</p> <p>14 continuum, a soft-hand technique is less intrusiv</p> <p>15 less of a measure than weapons such as batons, Ta</p> <p>16 it and pepper spray?</p> <p>17 continuum as Ma'am, I don't have that continuum to -</p> <p>18 can't answer that without actually looking at the</p> <p>19 continuum. My law enforcement time has ended, an</p> <p>20 don't keep things in memory. I will have to look</p> <p>21 it up.</p> <p>22 Q. Okay. Okay. When did your law enforce</p> <p>23 of times end?</p> <p>24 A. I retired in April 2019.</p> <p>25 Q. And you lost 20-something years of</p>

Page 66	Page 68
<p>1 experience?</p> <p>2 A. Yes. I don't -- I can't keep</p> <p>3 every little thing that has happened and</p> <p>4 learned over the years. I know what the</p> <p>5 it looks like, but I don't know that I'm</p> <p>6 in the exact order.</p> <p>7 Q. Okay. Okay. So does the Vance</p> <p>8 Sheriff's Office follow the BLET? You</p> <p>9 BLET training.</p> <p>10 A. Yes.</p> <p>11 Q. The Vance County Sheriff's Office</p> <p>12 follow BLET? Okay. I'm going to pull</p> <p>13 policy, and I want to -- I just want to</p> <p>14 a certain page of it. Okay? And Mr. Geis</p> <p>15 MR. GEIS: Which exhibit is this?</p> <p>16 number?</p> <p>17 MS. ROBINSON: We're marking</p> <p>18 Exhibit Number 5.</p> <p>19 (Exhibit 5 was marked for identification.)</p> <p>20 BY MS. ROBINSON:</p> <p>21 Q. If you can just turn to Page</p> <p>22 MS. ROBINSON: Michael, can we</p> <p>23 I want to see something right quick</p> <p>24 to start at 36 and 37.</p> <p>25 And, Mr. Geis, if it's okay with you</p>	<p>1 soft-hand technique other than the one at issue?</p> <p>2 In my head. I don't know if you consider a person o</p> <p>3 that as a soft-hand technique, so I can't compa</p> <p>4 use that what I consider to be a soft-hand techniq</p> <p>5 naming the. Okay. Okay. Well, let's just ask a mo</p> <p>6 general question.</p> <p>7 Have you ever or can you recall an inci</p> <p>8 talked about which you recommended separation when an offic</p> <p>9 employed a soft-hand technique?</p> <p>10 A. I don't recall any right now.</p> <p>11 Have you ever recommended separation wh</p> <p>12 employed a soft-hand technique?</p> <p>13 A. I don't recall that right now.</p> <p>14 Q. You -- let's go back to what was marked</p> <p>15 Exhibit Number 4, and that is your report.</p> <p>16 A. I have it.</p> <p>17 Q. You have your report in front of you?</p> <p>18 A. I have it.</p> <p>19 Q. You have it? Okay. You said that in y</p> <p>20 conclusion -- do you mind reading that next -- th</p> <p>21 next to the last sentence where it says, "Deputy</p> <p>22 could have used other options."</p> <p>23 I'm going "Deputy White could have used other opt</p> <p>24 prior to slamming Oliver to the ground. Deputy W</p> <p>25 And, Mr. Geis, if it's okay with you</p>
Page 67	Page 69
<p>1 once I wrap this up, can we take a</p> <p>2 MR. GEIS: Yes.</p> <p>3 MS. ROBINSON: Okay.</p> <p>4 MR. GEIS: Are you ready?</p> <p>5 THE WITNESS: Okay. I'm sorry</p> <p>6 BY MS. ROBINSON:</p> <p>7 Q. Okay. So this is a -- this po</p> <p>8 you tell us what this policy describes.</p> <p>9 A. I don't know this to be a policy.</p> <p>10 Q. Technique. What this technique describes</p> <p>11 A. On Page 36, it starts off with</p> <p>12 Is that what you're referring</p> <p>13 Q. The quick takes.</p> <p>14 A. The first one is bent wrist.</p> <p>15 is arm bar. The third one is multiple</p> <p>16 takedown. The fourth one is close quarter</p> <p>17 Q. And isn't it true that someone</p> <p>18 accidentally injured in any of these methods</p> <p>19 A. In a few.</p> <p>20 Q. Have a deputy -- has a deputy</p> <p>21 injured a citizen under your leadership</p> <p>22 A. I don't have anything coming</p> <p>23 now.</p> <p>24 Q. Can you recall an incident where you</p> <p>25 recommended separation for an officer who</p>	<p>1 lunchtime because Oliver was wearing glasses an</p> <p>2 moving uncontrollably. Deputy White's takedown</p> <p>3 maneuver was contrary to policy in that it caused</p> <p>4 fracture of the humerus bone in her left arm."</p> <p>5 I'm ready. Okay. Okay. So let's tease that apart a litt</p> <p>6 bit.</p> <p>7 Policy -- can Was the maneuver contrary to policy bec</p> <p>8 it caused a fracture?</p> <p>9 A. The maneuver was a slamming, and we don</p> <p>10 anything in our policy or training that allo</p> <p>11 anything quick to slam anybody.</p> <p>12 Q. Okay. Well, this doesn't say that the</p> <p>13 maneuver was a slamming and is contrary to policy</p> <p>14 The does it not?</p> <p>15 A. No.</p> <p>16 Q. Okay. This makes it seem as if the inj</p> <p>17 can be what was contrary to policy. I have -- I want</p> <p>18 ask you about mace. You said that Deputy White c</p> <p>19 have used mace or pepper spray.</p> <p>20 accidentally Are there any dangers associated with t</p> <p>21 use of pepper spray?</p> <p>22 mind right I have never experienced any danger tha</p> <p>23 associated with the use of mace. I have not</p> <p>24 experienced that.</p> <p>25 Q. You haven't? So you have -- you've use</p>

<p>Page 70</p> <p>1 force.</p> <p>2 Have you completed an excessive</p> <p>3 before?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. We'll get back to that.</p> <p>6 Has a citizen ever had an adverse reaction</p> <p>7 to pepper spray?</p> <p>8 A. I don't know of any citizen having</p> <p>9 adverse reaction to pepper spray that I</p> <p>10 involved in. Do I -- do I -- I don't know of any that</p> <p>11 comes to mind right now that I am aware</p> <p>12 having other than sometimes you -- they</p> <p>13 it? I'm at a loss of words. Not hyper-</p> <p>14 but -- I can't think of the word that I</p> <p>15 Over excitedly and panic -- panic, yeah</p> <p>16 attacks.</p> <p>17 Q. Okay. And if -- even if someone had, say,</p> <p>18 asthma, that could be harmful, correct?</p> <p>19 A. I don't know that to be the case.</p> <p>20 Q. You don't know that to be --</p> <p>21 A. I don't know if anybody who had</p> <p>22 been sprayed that had a harmful effect.</p> <p>23 of anybody. I don't have any personal</p> <p>24 Q. Okay. Do you -- I want to put</p> <p>25 use-of-force policy up again, so --</p>	<p>Page 72</p> <p>1 control arrest continuum?</p> <p>2 force report No. I'm not saying that. I answered t</p> <p>3 question about the -- Vance County following BLET</p> <p>4 training. I said yes.</p> <p>5 Q. Okay.</p> <p>6 Just the way you phrased it to me, does</p> <p>7 Vance County deputies go to BLET training, and I</p> <p>8 have been</p> <p>9 Q. Okay. Well, let me ask this question.</p> <p>10 Does the Vance County Sheriff's Office</p> <p>11 follow the BLET subject control arrest techniques</p> <p>12 continuum?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Does Vance County follow the BLET</p> <p>15 policies and procedures?</p> <p>16 A. I don't know what their policies and</p> <p>17 procedures are.</p> <p>18 Q. Okay. So you said that you have been</p> <p>19 involved in use of force -- the subject of a</p> <p>20 use-of-force investigation yourself?</p> <p>21 Yes.</p> <p>22 I don't know Can you explain that to me. How many t</p> <p>23 How many times have you been the subject of a</p> <p>24 use-of-force investigation?</p> <p>25 A. Between 5 and 15.</p>
<p>Page 71</p> <p>1 A. Is it Number 3?</p> <p>2 Q. Yes, that's Exhibit Number 3.</p> <p>3 MS. ROBINSON: Let's go down.</p> <p>4 down some, Michael. That's not what I'm looking</p> <p>5 for. Hold on. Go back up. Go back up. Right --</p> <p>6 here. Up, up, up. Right -- right there. Give</p> <p>7 me a second to find the exact sentence. strike on an individual, and I hit him in the head</p> <p>8 Let's pull up the BLET policy, and that</p> <p>9 is Exhibit Number 5.</p> <p>10 BY MS. ROBINSON:</p> <p>11 Q. We already discussed that the use of a clavicle strike?</p> <p>12 chemical dispersant was not a substitute for a soft</p> <p>13 technique, correct?</p> <p>14 A. I don't -- I don't recall --</p> <p>15 that.</p> <p>16 Q. On the continuum of force.</p> <p>17 A. I don't recall saying that.</p> <p>18 Q. But you do recall saying that Vance County</p> <p>19 employs the BLET's techniques in subject control</p> <p>20 arrests?</p> <p>21 A. No. You asked me did Vance County follow</p> <p>22 the training, have BLET training, follow BLET</p> <p>23 training. And I said yes to that.</p> <p>24 Q. So are you saying that Vance County</p> <p>25 Sheriff's Office does not follow the BLET</p>	<p>Page 73</p> <p>1 Q. 5 and 15 times? Can you explain those</p> <p>2 incidents to me.</p> <p>3 Let's scroll What occurred?</p> <p>4 I'm looking I pepper-sprayed people. That caused m</p> <p>5 up. Right be the subject of use of force. There wa</p> <p>6 there. Give me a second to find the exact sentence. strike on an individual, and I hit him in the head</p> <p>7 Those were the times.</p> <p>8 Q. Okay. Let's unpack that some.</p> <p>9 So you were saying you were trying to d</p> <p>10 use of a clavicle strike?</p> <p>11 Yes.</p> <p>12 Q. Explain what that is.</p> <p>13 I don't recall I was trying to get a subject under con</p> <p>14 by striking him in the clavicle. That's no longe</p> <p>15 allowed. That was my early training that initial</p> <p>16 allowed it, and now it's no longer allowed.</p> <p>17 So you struck the individual in the head</p> <p>18 A. Yes.</p> <p>19 Q. Was the individual injured?</p> <p>20 No.</p> <p>21 Q. Did the individual complain?</p> <p>22 A. No. I had to report it as a part of my</p> <p>23 reporting.</p> <p>24 Q. And so you used pepper spray on individ</p>

Page 74	Page 76	
<p>1 Can you tell me about those instances.</p> <p>2 A. I've had several occasions tried to arrest</p> <p>3 people who resisted, and I had to pepper spray them.</p> <p>4 Q. By "resist," what do you mean?</p> <p>5 people attack you?</p> <p>6 A. I mean, there have been multiple incidents.</p> <p>7 I've had a situation where I tried to arrest somebody.</p> <p>8 I tried to get them to push off of me, and the I-- at your investigations in which you were t</p> <p>9 sprayed them. There's been incidents where, subject of an excessive force investigation, and</p> <p>10 I tried to get the subject out of a car. I'd like to do is to shift a little bit into -- a</p> <p>11 to come out of the car, and I had to spray you familiar with the concept of 20/20 hindsight?</p> <p>12 Q. Have you ever used any soft-hand techniques Can you explain it.</p> <p>13 over chemical dispersants?</p> <p>14 A. Yes.</p> <p>15 Q. Can you explain those instances.</p> <p>16 A. Ma'am, I've arrested -- I can't put hindsight -- and Mr. Geis can tell you this too -</p> <p>17 on the people I've arrested and I grabbed their by the</p> <p>18 hand, put their arms behind their back, and I arrested MR. GEIS: Here we go now.</p> <p>19 them. That's one of the soft-hand approaches. And MS. ROBINSON: Huh?</p> <p>20 I've put my hands on people to arrest them. MR. GEIS: Oh, nothing.</p> <p>21 Q. Okay. But that's pretty common.</p> <p>22 A. Yes.</p> <p>23 Q. Do you put your hands on --</p> <p>24 A. For me.</p> <p>25 Q. Okay. Did any of these use-of force</p>	<p>I have to go to the restroom. Do you k</p> <p>Q. No. We can actually break for lunch no</p> <p>Did not long -- can we go of the record.</p> <p>(Recess in proceedings from 12:53 to 2:06 p.m.)</p> <p>BY MS. ROBINSON:</p> <p>Q. Mr. Bullock, I think we -- we left off</p> <p>the I-- at your investigations in which you were t</p> <p>subject of an excessive force investigation, and</p> <p>I'd like to do is to shift a little bit into -- a</p> <p>you familiar with the concept of 20/20 hindsight?</p> <p>Can you explain it.</p> <p>Q. So, typically -- and it might be in som</p> <p>your policies. You know, some of the policies fo</p> <p>Vance County quote Supreme Court authority. But</p> <p>hindsight -- and Mr. Geis can tell you this too -</p> <p>MR. GEIS: Here we go now.</p> <p>MS. ROBINSON: Huh?</p> <p>MR. GEIS: Oh, nothing.</p> <p>BY MS. ROBINSON:</p> <p>Q. -- is a concept in which you, looking b</p> <p>could have maybe done something differently but</p> <p>weren't necessarily unreasonable.</p> <p>Are you familiar with that concept?</p>	
Page 75	Page 77	
<p>1 instances in which you were a subject in result in any</p> <p>2 type of investigation?</p> <p>3 A. When I was a deputy at the time, I had to</p> <p>4 write a use-of-force report. I had to talk to the evaluation of Mr. White?</p> <p>5 captain at the time, and then I haven't heard anything.</p> <p>6 else from it since those -- then.</p> <p>7 Q. And this occurred at the Vance County</p> <p>8 Sheriff's Office, correct?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Does the Vance County Sheriff's Office train</p> <p>11 officers on the use of force?</p> <p>12 A. We have BLET update that mandate training.</p> <p>13 that we go through, and we have a training course</p> <p>14 that takes us through those legal updates.</p> <p>15 what it was when I was here. I don't know what it is</p> <p>16 now.</p> <p>17 Q. All right. Who was the training officer?</p> <p>18 A. It's Captain Shelton.</p> <p>19 Q. And what would he train the officers on?</p> <p>20 What techniques?</p> <p>21 A. He would go through the arm bar techniques</p> <p>22 You know, the chin strike has to be a little bit</p> <p>23 simulated because it's -- you don't want anybody's</p> <p>24 chin being struck. We would go through the subject</p> <p>25 takedown subject control techniques.</p>	<p>I understand how you explained it to me</p> <p>understand what you're saying.</p> <p>Q. Okay. Okay. Did that at all factor in</p> <p>your evaluation of Mr. White?</p> <p>No.</p> <p>Q. No? Okay. Why not?</p> <p>A. You're asking me about the concept of 20</p> <p>hindsight. At the time I did Mr. White's</p> <p>investigation, 20/20 hindsight wasn't in my mind.</p> <p>no bearing on my decision -- on my</p> <p>recommendation. Not decision, but recommendation</p> <p>Q. Okay. Another question I had -- we tal</p> <p>about the reports that you relied on or the state</p> <p>That you relied on.</p> <p>Did -- were they all written statements</p> <p>Goolsby and Welborn made written statements, prov</p> <p>written statements?</p> <p>A. I believe they did.</p> <p>Q. Okay. Earlier in the morning, probably</p> <p>early in the morning, you talked about the use of</p> <p>canines in conjunction with incident reports.</p> <p>A. I don't recall using the word "canines.</p> <p>Q. Well, is a canine a use of force or</p> <p>the subject -- would the use of a canine be subject t</p> <p>incident report?</p>	

Page 78	Page 80	
1 A. Yes.	1 the canines -- some of the canines also had a dual	
2 Q. Okay.	2 purpose in which they were used for drug-sniffing	
3 MS. ROBINSON: Michael, can you	3 -- purpose to apprehend.	
4 some questions.	4 Q. Okay. How do you-all train the canines	
5 BY MS. ROBINSON:	5 sniff for drugs?	
6 Q. So does the Vance County Sheriff's Office	6 Say that again. I'm sorry?	
7 employ canine units and canine handlers?	7 Q. How do you train the canines to sniff o	
8 A. Yes. We did back then.	8 identify drugs?	
9 Q. Back then? Okay. And so let me -- let me	9 I don't know, ma'am. I don't have any	
10 clarify this too. And I'll go on the record saying	10 knowledge of that at all.	
11 this, you know, as clearly as possible.	11 Nothing you That was just a stray question.	
12 say will be outside of the scope of your	12 tenure there. Were any of the incidents known suspect	
13 Okay?	13 that you can recall of?	
14 A. Okay.	14 A. In what incidents?	
15 Q. So just feel free, understanding that all of	15 Where the canine has attacked someone,	
16 your answers speak for your knowledge and	16 and you're just -- were there any nonsuspects?	
17 there. Okay?	17 A. Yes. A canine has bitten a handler.	
18 And so do the deputies control	18 their Q. And that's the only kind of nonsuspect	
19 animals?	19 situation?	
20 A. The canine handler -- each animal is	20 A. I don't -- you know, what's -- what's f	
21 assigned to one handler, and it's the handler's	21 my memory is that, you know, we had a dog who	
22 responsibility to control that dog.	22 often bite his handler. So that's fresh in my me	
23 Q. And those handlers are trained to control	23 their Q. And that's the only kind of nonsuspect	
24 their dogs?	24 think a lady got bit by a dog during a building s	
25 A. Yes.	25 or doing an area search at an old school supply p	
Page 79	Page 81	
1 Q. Has there ever been an incident where a	1 that's sort of fresh in my mind, where the office	
2 canine unit injured a citizen?	2 thought the place was vacant and someone had got	
3 A. Yes.	3 Q. Was -- did you investigate that handler	
4 Q. Can you describe these incidents to me.	4 A. I don't -- I don't think that came to m	
5 A. We've had -- in the process of taking	5 Q. Okay. Do you recall if that handler wa	
6 subjects into custody where the -- the	6 terminated?	
7 where the canine could be released to try to take	7 the I do not.	
8 subject in custody, the dog has bitten	8 subjects. Q. Have there been instances in -- where t	
9 Q. Okay. So you said the dog has bitten	9 use of a canine has been considered excessive for	
10 subjects?	10 A. It has not come to me, no. Not where i	
11 A. Yes.	11 arose where it came to me.	
12 Q. Is there a certain heightened	12 situation in But you've conducted investigations of	
13 which a canine unit will be brought out,	13 like canine handlers?	
14 misdemeanor, a felony, or --	14 A. No.	
15 A. We've taken canines on situations where	15 Q. You have not?	
16 we've had to hunt for felons that may have run off	16 in No.	
17 the woods. And we've called out and gave them ample	17 Q. So that would go to someone else?	
18 time to turn themselves in and say we're	18 going to A. Yes.	
19 release the canine, and then the canine	19 goes in and Q. Like who?	
20 he's bitten people.	20 A. Probably the commander, whatever -- wha	
21 We've had cases where we've taken a	21 shift commander that would -- would have been wor	
22 with us on drug raids. I can't recall	22 any specific time who was supervising that officer.	
23 incident where, you know, they've bitten	23 people in Q. Why wouldn't it rise to you? Why would	
24 drug raids, but we use them there. And	24 then it rise to the level of you?	
25 deputies use canines sometimes on traffic	25 stops to A. -- It has never been put in practice. I m	

Page 82	Page 84
<p>1 there hasn't been an incident where we 2 felt that a handler has used a canine in 3 egregious way that it would rise to me. 4 Q. But canines have bitten people 5 suspects and injured them, but it hasn't 6 your desk? 7 A. Yes, ma'am. That's the -- that 8 the suspects. 9 Q. How many civil suits result from excessive 10 force in Vance County? 11 A. I have no idea. 12 Q. No idea? If there were, would you know 13 about it? 14 A. Not necessarily. 15 Q. What does "not necessarily" mean? 16 A. If I pick it up or hear somebody 17 about it. But they wouldn't come to me 18 there's a civil suit because of this." It 19 wouldn't have anything to do with that. 20 Q. I do want to kind of go back to 21 canines are trained because, you know, 22 considered weapons, correct? 23 A. Those are considered what? 24 Q. They're considered -- they're 25 utensils of the sheriff's.</p>	<p>1 felt that Q. I Okay. Michael has pulled up -- and thi 2 such will be Exhibit 6. 3 (Exhibit 6 was marked for identification.) 4 and Bitten ROBINSON: 5 made it to Q. The canines. Do you have that policy i 6 front of you? 7's posted by Yes, ma'am. 8 Q. Just take a moment and skim that policy 9 MS. ROBINSON: Slow down. Let's go som 10 more. 11 THE WITNESS: Okay. 12 MS. ROBINSON: 13 Q. Okay. So are you familiar with this po 14 A. I know that it exists. I'm not intimat 15 familiar with it, but I know that it exists. 16 Q. And you've reviewed it? 17 And say, "Hey, I said I know that it does exist. I'm 18 it's intimately familiar with it, but I do know that i 19 exists. 20 how these Q. Okay. Well, my follow-up question is t 21 those are re comfortable now with your review of it? 22 A. I'll answer questions based on what's h 23 before me. 24 Q. Okay. Thank you. There are approximat 25 12 pages in front of you.</p>
Page 83	Page 85
<p>1 A. No, ma'am. I think they're con 2 canines. I don't know anything about canine traini 3 Q. You don't know anything about it, but you 4 can -- 5 A. All I know is that a canine officer have to "Controlled substances used as training 6 go through training in order to become a canine will be obtained through the courts after final 7 handler. I don't know anything about the disposition of the cases. A court order must be 8 their training. 9 Q. Do you know something about the use of the 10 canine? 11 A. Yes. 12 Q. Okay. Do you keep -- do they keep records? 13 Who's in charge of canine training? Who's 14 responsible? 15 A. There would be different people over and over 16 and I don't know who they were in any given particular 17 time. Once -- Lieutenant Shearin has been in charge 18 of canine records. There's an Officer Smiley who 19 used to be in charge of canine records. 20 But over time, I don't know who was in 21 charge at all in a particular time. 22 Q. Okay. So you talked about the use of 23 canines during a drug bust. 24 Have you ever used them personally 25 A. No. I never used a canine personally</p>	<p>1 considered Can you go to Page 4, please. 2 canine training. Okay. 3 Q. I would like for you to read that first 4 bullet point. 5 to "Controlled substances used as training 6 a canine will be obtained through the courts after final 7 the disposition of the cases. A court order must be 8 prepared by the presiding judge of the case. The 9 officer will designate the controlled substance fro 10 case to be used by the Vance County Sheriff's Off 11 for canine training. All controlled substances w 12 be obtained from cases in which the Sheriff's Off 13 federal agency was the arresting entity. Pr 14 to obtaining these training aids, they must be te 15 over and over and highlighted by an approved laboratory." 16 Q. So does Vance County used controlled 17 substances to train their canines? 18 A. I'm not familiar with it, ma'am. 19 Q. Would you be surprised if a canine bit 20 suspect -- 21 A. No, ma'am, I would not be surprised if 22 a canine bit a suspect. 23 Q. -- who had a controlled substance that 24 canine was trained and used to detect, based on u 25 of drugs?</p>

 **AdvancedONE**
LEGAL

(866) 715-7770
advancedONE.com

Page 90	Page 92
<p>1 Q. Yes.</p> <p>2 A. This is actually the field portion of the training, not the (audio interference) portion.</p> <p>3 THE REPORTER: What portion?</p> <p>4 THE WITNESS: Field portion, actual field training, out into the range and using the range. Usually, the range and range are used interchangeably.</p> <p>5 (Off-the-record statement by the reporter who)</p> <p>6 BY MS. ROBINSON:</p> <p>7 Q. So, Mr. Bullock, what we have on the screen now is your signature on the use-of-deadly-force</p> <p>8 handout.</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Okay. Can you read "C" for us, please?</p> <p>11 Well, first, before you do this, review the document.</p> <p>12 MS. ROBINSON: Michael, please scroll down so he can review this document. So we can see his signature. I can't</p> <p>13 THE WITNESS: Okay.</p> <p>14 BY MS. ROBINSON:</p> <p>15 Q. Is that your signature?</p> <p>16 A. Yes, ma'am.</p> <p>17 MS. ROBINSON: Exhibit 9.</p> <p>18 (Exhibit 9 was marked for identification.)</p> <p>19 BY MS. ROBINSON:</p>	<p>1 subsection only when it is or appears to be reasonable and necessary thereby to defend himself or a third</p> <p>2 person from what he reasonably believes to [be] t</p> <p>3 use of imminent use of deadly physical force; to</p> <p>4 attempt to escape from the custody of a person who he reasonably believes is</p> <p>5 attempting to escape by means of a deadly weapon</p> <p>6 who by his conduct or any other means indicates t</p> <p>7 he presents an imminent threat of death or serious</p> <p>8 physical injury to others unless apprehended with</p> <p>9 force; or to prevent the escape of a person from</p> <p>10 custody imposed upon him as a result of [a] convi</p> <p>11 for a felony."</p> <p>12 Q. Okay. So let's go back to what was marked</p> <p>13 The document, Exhibit 4, which was your investigation to</p> <p>14 Ms. Oliver's complaint.</p> <p>15 Okay.</p> <p>16 Q. Mr. White was serving two felony warrants</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. Mr. White informed you that Ms. Oliver</p> <p>20 assaulted him, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And under that policy that you just read</p> <p>23 could have used deadly force, correct?</p>
Page 91	Page 93
<p>1 Q. And do you recognize this document?</p> <p>2 A. Yes, ma'am. This is the document which we</p> <p>3 have found the training on about September 3</p> <p>4 2018, where Instructor Bartholomew signed it and where</p> <p>5 I signed it as a student.</p> <p>6 Q. Okay. And can you read "C."</p> <p>7 read -- let's go back to the --</p> <p>8 MS. ROBINSON: Scroll up some, Michael.</p> <p>9 BY MS. ROBINSON:</p> <p>10 Q. So this is the deadly force policy and</p> <p>11 handout?</p> <p>12 A. Yes, ma'am. This is what the instructor</p> <p>13 gives us to sign when we're in the classroom portion</p> <p>14 of the firearms qualification.</p> <p>15 Q. Okay. So let's read the use of force back into your memory very well, so let's see if al</p> <p>16 arrest. It says, "A law enforcement officer who has these other conversations come back to your memor</p> <p>17 you can't finish -- can you finish that sentence the same way.</p> <p>18 me. On here it's "C," so --</p> <p>19 A. Start with "C"?</p> <p>20 Q. We want to read where it says</p> <p>21 enforcement officer...." and then end with "C" that</p> <p>22 sentence.</p> <p>23 A. "A law enforcement officer is justified in</p> <p>24 using deadly physical force upon another person for</p> <p>25 [the] purpose specified in Subdivision</p>	<p>1 A. No, ma'am.</p> <p>2 Q. She was a felon under "C." Read</p> <p>3 Subsection C.</p> <p>4 Under "C," ma'am, "to prevent the escape</p> <p>5 a person from custody imposed upon him as a resul</p> <p>6 Well, [a] felony conviction]."</p> <p>7 She hadn't been convicted, and this is,</p> <p>8 Michael, used for people who are -- has a sentenc</p> <p>9 imposed on them, like in the prison system. To s</p> <p>10 an involuntary felony warrant is not justification</p> <p>11 use deadly force.</p> <p>12 Q. Okay.</p> <p>13 And she hasn't been convicted of any fe</p> <p>14 Q. Okay. So let's talk about that. That</p> <p>15 back into your memory very well, so let's see if al</p> <p>16 these other conversations come back to your memor</p> <p>17 sentence the same way.</p> <p>18 So you said that you interviewed Goolsb</p> <p>19 correct?</p> <p>20 A. No, ma'am. I never said I interviewed</p> <p>21 I said I talked with him. I said I tal</p> <p>22 with him, I talked with Sergeant Welborn, and I t</p> <p>23 I talked with Captain Watkins. I never said I interviewed</p> <p>24 person for</p> <p>25 of this Q. Okay. Well, you talked with them.</p>

Page 94	Page 96	
<p>1 Are any of those conversations coming back 2 to memory? 3 A. No. 4 Q. None? 5 A. None. 6 Q. Welborn isn't coming back to memory? 7 A. No, ma'am. 8 Q. Watkins? 9 A. The only thing I can say before 10 thing from Watkins I remember is he was 11 initially spoke with Ms. Oliver. That 12 back to my -- to memory with. 13 Q. Okay. Okay. That's fair. In your 14 calculated from 1997 until 2018, you were in an 15 administrative role. 16 How many officers had used deadly force in 17 your tenure? 18 A. I don't know, ma'am. I would 19 many used deadly force? 20 Q. Right. 21 A. Is that what you said? Okay. 22 Three are coming to mind that I can recall 23 as we're talking, at least three. 24 Q. And what were those instances? 25 A. We had a deputy who was assisting</p>	<p>1 coming back murder suspects that had committed murder 2 our county and a neighboring county. 3 Q. Had they been convicted of murder? 4 A. I don't know what their convictions were. 5 Q. No, no. You said "committed." 6 Had they been convicted at that time? 7 A. Not on those particular murder charges. 8 had warrants for murder. 9 -- the only Okay. 10 the one that And the deputy came upon the vehicle th 11 whatever coming, and a chase ensued. And when the deputy 12 out of the car, they fired. The deputy returned 13 That was another deadly force use that was exoner 14 And then the last one that's coming to 15 is there was a chase that ensued, and the vehicle 16 run over one of the officers. And he fi 17 and he was exonerated. 18 Q. Tell me about that vehicle chase. 19 A. The last one I was referring to? 20 Q. Uh-huh. 21 Ch, yes. A. There was a chase. I don't know the re 22 right the chase, but there was a chase. The vehicl 23 went to the lake area and got into, like, a woode 24 area. And the deputies thought that he was going 25 jump out of the vehicle. They started running</p>	
Page 95	Page 97	
<p>1 control unit to take somebody's dog, and 2 out with shotgun. And the deputy several 3 her to "Drop the shotgun, drop the shotgun, drop the 4 shotgun." And when the person started lowering the 5 shotgun towards him pointing, he shot her. 6 incident. 7 Another incident is where we were in a car 8 chase. 9 Q. Was the outcome of that? Was that deadly 10 force investigated? 11 A. Yes, ma'am. 12 Q. And what was the outcome? 13 A. He was exonerated. 14 Q. Exonerated? Okay. And then another one was 15 what? 16 That person was shot? That citizen was 17 shot? 18 A. Yes, ma'am. 19 Q. And injured, dead or alive? 20 A. They didn't die. 21 Q. They didn't die. But no fatal 22 shot? 23 A. No, no. She wasn't -- she wasn't killed. 24 Q. Okay. And -- okay. And the other instance 25 A. There's an incident in which</p>	<p>1 the into the woods. As they were running to the wood 2 man out of woods. He saw one of the deputies. 3 dropped the towards the deputy and accelerated at a hi 4 lowering the speed towards the deputy, and the deputy 5 That's one 6 Q. And the deputy was exonerated? 7 A. Yes, ma'am. 8 Q. Was the person injured? 9 Yes. 10 Q. How so? 11 A. He was grazed in the shoulder. 12 Q. How long did it take before that deputy 13 exonerated? Do you recall? 14 I don't know. I don't know how long it 15 any of them to be exonerated, because all of them 16 involved also the SBI having to come in and do th 17 investigation -- do an investigation as well. 18 Q. Well, I'm glad you mentioned that becau 19 was wondering if you acted as your own internal 20 affairs department or if the SBI gets involved or 21 Pity, that process looks like in your use of force. 22 A. Any officer-involved shooting, the SBI 23 't killed. 24 Q. Any? Okay. That's the policy, the 25 practice?</p>	

Page 98	Page 100	
<p>1 A. That's the practice.</p> <p>2 Q. Does Vance County have an internal affairs</p> <p>3 department, or are you it?</p> <p>4 A. I conduct most of them, and then there have</p> <p>5 been occasions in where, depending on the size of the</p> <p>6 I've had to rely on other officers, other detectives</p> <p>7 that's appointed by the sheriff. Typically, it may be</p> <p>8 a detective and another officer.</p> <p>9 Q. What training do those officers have?</p> <p>10 A. I don't know what training -- I don't know</p> <p>11 what their training is.</p> <p>12 Q. I do want to talk about training a little</p> <p>13 bit.</p> <p>14 What training did you have to conduct</p> <p>15 use-of-force investigations?</p> <p>16 A. I've only -- you know, in terms of my</p> <p>17 training, my training was early on in my</p> <p>18 career when I first started doing these</p> <p>19 investigations. The other training has been</p> <p>20 through -- going through, having done these over time.</p> <p>21 When I first started doing this internal</p> <p>22 investigation, I was under the supervision of -- at</p> <p>23 the time, the captain at the time.</p> <p>24 Q. What time --</p> <p>25 A. My training came through -- and</p>	<p>1 it was after I had started helping the captain with</p> <p>2 internal affairs type of investigations.</p> <p>3 Q. And for the most part, you conducted these</p> <p>4 investigations as a single individual?</p> <p>5 A. For the most part, yes, ma'am.</p> <p>6 Q. Did you ever request help?</p> <p>7 A. I'm sorry?</p> <p>8 Q. Did you ever request help?</p> <p>9 A. Help has been had. You know, the -- in</p> <p>10 I don't know part of my -- doing these investigations,</p> <p>11 captain has had other officers helping some of the</p> <p>12 When you have an officer-involved shooting</p> <p>13 then I request help from the SBI.</p> <p>14 Q. Okay. And not within your department?</p> <p>15 A. I'm sorry?</p> <p>16 Q. Not within your department? You don't</p> <p>17 request help within your department?</p> <p>18 There have been a rare occasion. Again</p> <p>19 and that's -- for the most part, it's been early</p> <p>20 time. Did you -- can you recall a time in which</p> <p>21 you had, like, a panel of investigators?</p> <p>22 A. Yes. There was an officer who was a pa</p> <p>23 deputy working an area of the county in which his</p> <p>24 in-laws lived, and it was determined that he went</p> <p>25 to the in-laws' house, burglarized their</p>	<p>captain with</p> <p>type of investigations.</p> <p>And for the most part, you conducted these</p> <p>investigations as a single individual?</p> <p>For the most part, yes, ma'am.</p> <p>Did you ever request help?</p> <p>I'm sorry?</p> <p>Did you ever request help?</p> <p>Help has been had. You know, the -- in</p> <p>I don't know part of my -- doing these investigations,</p> <p>captain has had other officers helping some of the</p> <p>When you have an officer-involved shooting</p> <p>then I request help from the SBI.</p> <p>Okay. And not within your department?</p> <p>I'm sorry?</p> <p>Not within your department? You don't</p> <p>request help within your department?</p> <p>There have been a rare occasion. Again</p> <p>and that's -- for the most part, it's been early</p> <p>time. Did you -- can you recall a time in which</p> <p>you had, like, a panel of investigators?</p> <p>Yes. There was an officer who was a pa</p> <p>deputy working an area of the county in which his</p> <p>in-laws lived, and it was determined that he went</p> <p>to the in-laws' house, burglarized their</p>
<p>1 came through him as far as the on-the-job training</p> <p>2 Q. So you said when you "first started doing</p> <p>3 these."</p> <p>4 And "doing these," you mean use-of-force</p> <p>5 investigations?</p> <p>6 A. I mean internal affairs investigations.</p> <p>7 Q. Internal affairs, which would encompass</p> <p>8 of force?</p> <p>9 A. Some of them encompass use of force.</p> <p>10 Q. What year did you start that?</p> <p>11 A. 1997.</p> <p>12 Q. 1997? Okay. And you were trained by the</p> <p>13 captain --</p> <p>14 A. Yes.</p> <p>15 Q. -- at the time?</p> <p>16 Did you take any classes?</p> <p>17 A. I can only remember one time</p> <p>18 class in internal affairs investigation</p> <p>19 remember going any time but one time.</p> <p>20 Q. Okay. What time -- what -- do you</p> <p>21 what year?</p> <p>22 A. It would -- it would have been</p> <p>23 shortly thereafter in 1997, but I -- I</p> <p>24 it was in 1998 or -- you know, I don't</p> <p>25 I just don't -- I don't remember the exact</p>	<p>1 And then when the alarm -- or when the call was made</p> <p>2 back down there to do the investigation of</p> <p>3 that break-in, and it was determined that he was</p> <p>4 that actually did the break-in.</p> <p>5 More than one investigator worked that</p> <p>6 investigations.</p> <p>7 Q. Tell me about that. What do you mean more</p> <p>8 than one worked it? What did they do?</p> <p>9 A. I -- a minimum of three people, maybe four</p> <p>10 helped with that investigation. That officer was</p> <p>11 ended up being fired and criminally charged.</p> <p>12 That's, like, a common theme right now,</p> <p>13 right, in Vance County?</p> <p>14 MR. GEIS: Don't answer.</p> <p>15 MS. ROBINSON: Did you object, Chris?</p> <p>16 think I heard you say something.</p> <p>17 MS. ROBINSON:</p> <p>18 Q. You said more than one investigator</p> <p>19 worked -- let me just make a note, and this is --</p> <p>20 you recall let's go off the record for this.</p> <p>21 (Discussion off the record.)</p> <p>22 Recess in proceedings from 2:57 to 3:01 p.m.</p> <p>23 MS. ROBINSON:</p> <p>24 Q. Mr. Bullock?</p> <p>25 Yes, ma'am.</p>	<p>call was made</p> <p>of</p> <p>that he was</p> <p>that actually did the break-in.</p> <p>More than one investigator worked that</p> <p>investigations.</p> <p>Q. Tell me about that. What do you mean more</p> <p>than one worked it? What did they do?</p> <p>A. I -- a minimum of three people, maybe four</p> <p>helped with that investigation. That officer was</p> <p>ended up being fired and criminally charged.</p> <p>That's, like, a common theme right now,</p> <p>right, in Vance County?</p> <p>MR. GEIS: Don't answer.</p> <p>MS. ROBINSON: Did you object, Chris?</p> <p>think I heard you say something.</p> <p>MS. ROBINSON:</p> <p>Q. You said more than one investigator</p> <p>worked -- let me just make a note, and this is --</p> <p>you recall let's go off the record for this.</p> <p>(Discussion off the record.)</p> <p>Recess in proceedings from 2:57 to 3:01 p.m.</p> <p>MS. ROBINSON:</p> <p>Q. Mr. Bullock?</p> <p>Yes, ma'am.</p>

Page 102	Page 104
<p>1 Q. Did you just have a conversation off the 2 record? 3 A. Yes. 4 Q. Was it about your questions, responses? 5 A. No, ma'am. 6 Q. What was it about? 7 A. It was about how long -- how much longer 8 it's going to take for us to finish this 9 Q. I got an answer for you. 10 A. Oh. 11 Q. I'm going to get you out of here. Okay? 12 I'm almost done. 13 A. Okay. 14 Q. I'm almost done. Okay. And we, really, 15 might be approaching done. Now, you know, I can hold 16 you for seven hours and question, question, 17 but I -- 18 A. It's totally okay. You have a right to know, 19 it. I'm okay with it. 20 Q. No. I asked you some about Mr. White 21 earlier, and I think you told me you didn't have very 22 much interaction with him, correct? 23 A. That's correct. 24 Q. And you didn't hear much about him, either? 25 A. No, ma'am, I didn't. He was</p>	<p>19 -- I me 2 between 1997 and 2001. It was somewhere in that 3 range. 4 Q. But it was significant enough for you to 5 remember? 6 A. Yes, ma'am. Because I had an officer -- 7 That was very significant. 8 Q. Why was it significant? 9 A. I considered him a friend. 10 Q. Okay. Can you recall the number of cit 11 who have complained to Vance County or filed 12 grievances or any of that nature? 13 A. No, ma'am. 14 Q. Would you say it's a lot, a little? 15 I don't -- again, I just don't have a - 16 I have anything to go on. I don't have anyth 17 significant to go on with that for me -- for it t 18 right out know, flare up in my memory. 19 There could have been complaints that w 20 directed to an officer's supervisor, and that wou 21 on. And someone would have looked into 22 that, and that supervisor would have handled that 23 know, outside my knowledge. So I -- and even wit 24 I -- did eventually come to my desk, I 25 from about the</p>
Page 103	Page 105
<p>1 division from me, so he wasn't in my direct 2 command. So other than seeing him in the 3 passing through the office, it was just 4 would come -- he's walked by my office 5 he's poked in, and, you know, we spoke 6 again, it was so far and few between. 7 Q. Okay. We were talking about the 8 investigations that you completed at Vance County 9 And from what I understand, most of them were one 10 person. And you were telling me about the time in 11 which there was more than one investigation, 12 situation involved an incident in which an officer 13 behaved, you know, badly. 14 Did you seek assistance in that 15 investigation, or did -- was assistance provided to 16 you? 17 A. At the time I was captain -- 18 captain that was doing those investigations 19 particular case was assigned to me, and 20 decision as to what other officers would 21 Q. So that was around the 1997 when you were 22 telling me you had been trained? 23 A. Well, no. It was -- it might 24 200- -- I mean, a significant -- you know 25 have -- it wasn't early on. It was, you</p>	<p>1 direct have been. 2 office, Q. Okay. Well, you just don't appear to m 3 like a person who would scare easily; is that tru 4 before, and A. I'm scared of snakes and dogs. 5 before. Q. Okay. But you can handle complaints wh 6 you're doing your job? 7 A. I can handle what? 8 Q. Complaints when you're doing your job. 9 A. Yes, ma'am. 10 Q. So you -- do you have a working knowled 11 the number of times the county sheriff's departme 12 an officer came to, like, threats of suit? Is that 13 A. I don't know what -- threats of soup? 14 Q. How many people -- how many citizens 15 threatened to sue the sheriff's office? 16 A. Oh, I have no idea. 17 Q. Has any citizen threatened to sue you i 18 didn't investigate? 19 A. No, ma'am. You know, I don't -- you kn 20 I've been sued before, but I don't know the numbe 21 who have threatened to sue the sheriff's 22 office. And I've never been threatened to, "If y 23 have done it something, I'm going to sue you." 24 it might I've never had that to happen. 25 know -- Q. Or sue the sheriff's office?</p>

Page 106	Page 108
<p>1 A. Or sue the sheriff's office.</p> <p>2 people -- you know, I -- you know, it is</p> <p>3 it's a -- it's a common thing for people</p> <p>4 I'm going to sue you." But I -- you know,</p> <p>5 for me, there's nothing that has an effect</p> <p>6 say, "Oh, my God. This person will sue</p> <p>7 do X, Y, Z." I don't -- I don't have a</p> <p>8 doesn't sway me one way or another. I've</p> <p>9 words "I'm going to sue you" a lot. You</p> <p>10 going to sue you-all" a lot. But you have</p> <p>11 sue, so --</p> <p>12 Q. So -- but you've been sued before?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. How many times?</p> <p>15 A. I would say four other times,</p> <p>16 other times.</p> <p>17 Q. Do you recall those instances?</p> <p>18 A. Oh, yes, ma'am. That's significant</p> <p>19 memory. So yes.</p> <p>20 Q. Can you explain them to me.</p> <p>21 A. Okay. There was a time that</p> <p>22 that I had -- I was driving north on the</p> <p>23 and then a highway patrolman was working</p> <p>24 had already occurred. And I stopped because</p> <p>25 was partially blocked by the ambulance</p>	<p>1 I mean, I got sued one time where a fight had</p> <p>2 happened at a club. An officer put a suspect in</p> <p>3 back of a car. The suspect kicked out the glass.</p> <p>4 officers tried to get the suspect out of the car.</p> <p>5 They started fighting with him, like, from the in</p> <p>6 side of the car. He was kicking officers, kicking</p> <p>7 officers.</p> <p>8 Another officer sprayed him with mace,</p> <p>9 and his foot was broke. We don't know if it was broke</p> <p>10 of him kicking the glass out or kicking</p> <p>11 officers or what, but that person sued me and all</p> <p>12 other officers there.</p> <p>13 And then I think two occasions I've been</p> <p>14 sued for people who were dead at the jail.</p> <p>15 Q. Okay. Thank you. Thank you for explain</p> <p>16 those situations.</p> <p>17 The only question I have is if you -- t</p> <p>18 extent you are able to share, what were the outco</p> <p>19 A. I guess the correct word -- I don't know</p> <p>20 don't know the legal term, but I considered it as</p> <p>21 was exonerated. I was exonerated on all of them.</p> <p>22 Q. Okay. So I want to -- I want to get --</p> <p>23 a want to make sure I understand this.</p> <p>24 There is no board review -- no standard</p> <p>25 board review on use-of-force incidents?</p>
Page 107	Page 109
<p>1 trooper's car and the -- one of the victims' cars.</p> <p>2 I stopped and backed up and put on -- put</p> <p>3 put on my traffic vest. And I start directing</p> <p>4 traffic, slowing traffic down, because the</p> <p>5 kind of a little bit over a slight decline.</p> <p>6 And I had been out there slowing traffic</p> <p>7 down for about 20 minutes or so, and then</p> <p>8 pulling a mobile home, like a transport</p> <p>9 a mobile home, came through at a very, very</p> <p>10 of speed and was not obeying my traffic</p> <p>11 for him to slow down. And then at the</p> <p>12 looked up, and he locked the brakes. The</p> <p>13 off and just wiped out the ambulance and</p> <p>14 And so that was one time.</p> <p>15 Q. What did he sue you for?</p> <p>16 A. I guess it was, like, failure</p> <p>17 my duty, causing that wreck. But that</p> <p>18 up -- it didn't get far.</p> <p>19 Another time I was working the</p> <p>20 room, and I was leaving to go to lunch.</p> <p>21 and a city officer had a person stopped</p> <p>22 stop. I drove up and said, "You-all go</p> <p>23 And they said "yeah." And I</p> <p>24 then that person sued me as a result of</p> <p>25 transpired in that traffic stop.</p>	<p>1 A. So There is no standard board review?</p> <p>2 Q. So there is no board that will convene</p> <p>3 saying, you know, this member must be a part of t</p> <p>4 board, that member; you get an amount of time to</p> <p>5 respond; there is --</p> <p>6 A. That wasn't a practice.</p> <p>7 Q. It wasn't a practice? Was it a practice</p> <p>8 a pulling was there a standard number of complaints th</p> <p>9 must be had before an officer is dismissed?</p> <p>10 my signals No, ma'am. Each thing is done, you know</p> <p>11 last minute incident. It wasn't, like, a buildup of anyt</p> <p>12 I'm going to stand up. My back is hurt</p> <p>13 I'm going to stand up and stretch. I can st</p> <p>14 here. I just need to stand up.</p> <p>15 Q. Mr. Bullock, if you want to take a</p> <p>16 ten-minute break --</p> <p>17 that ended No, no, no. I don't. I don't.</p> <p>18 Q. Okay. Okay.</p> <p>19 A. I just didn't want you to say, "What ar</p> <p>20 And to be honest I just needed to stretch.</p> <p>21 Q. Okay. That's fine.</p> <p>22 everything?" Is there a certain threshold that incre</p> <p>23 the likelihood to be dismissed from --</p> <p>24 that had A. I don't understand that question.</p> <p>25 Q. So is a severity of a deputy's actions,</p>

Page 110	Page 112
<p>1 increases his or her likelihood to be dismissed? 2 A. We work at the pleasure of the sheriff. I 3 can't answer that question. 4 Q. Well, for your recommendation. 5 A. My recommendation is done on a case-by-case 6 basis. 7 Q. Do you find that different sheriffs have 8 different thresholds? 9 A. I don't know how to apply that question. 10 It's apples to oranges, in a way. By working at the 11 pleasure of sheriff, I can't apply that. 12 Q. Now I'm asking you, would soliciting sexual 13 favors from citizens be a serious complaint? 14 A. I think that it would. 15 Q. And just so I can understand it, is it this 16 is you. 17 Is assault a serious infraction? 18 A. Assaults can mean -- have a range, so it 19 depends on the range of the assault. 20 Q. Is it a requirement that supervisors be involved 21 in instances in which deputies are involved in domestic 22 violence? 23 A. I don't know when you say supervisors, I think 24 it a requirement for supervisors to report. Then, no, 25 if a -- if a deputy is called to a house where there's</p>	<p>dismissed? A. I don't remember any. sheriff. Q. How much discretion does an officer have 3 to enforce the law, would you say? 4 A. I don't know if I can put a quantitative 5 number on how much discretion an officer has. An 6 officer has some discretion. An officer is not 7 without discretion. An officer doesn't have unlimited 8 discretion. 9 question. Q. Are there instances in which an officer 10 has no discretion to enforce the law? 11 A. Yes, ma'am. I believe there are instances in 12 which an officer has no discretion to enforce the law. 13 Q. What are those instances? 14 A. If a person murdered someone in front of 15 an officer, I think the officer doesn't have any 16 discretion to enforce the law. I think he would 17 have to enforce the law. 18 Q. So if a sheriff's officer shot a citizen 19 they should be placed under arrest immediately? 20 A. No, ma'am. It depends on the circumstances. 21 In the first incident, I said "murder." If a 22 sheriff's officer shot somebody and it wasn't murder, 23 then, no, they shouldn't be arrested. If they shot 24 someone in self-defense, then they shouldn't be arrested.</p>
Page 111	Page 113
<p>1 deputy is involved in domestic violence, then I should 2 have been an incident report generated from that officer. 3 Q. There should have been an incident? 4 A. Uh-huh. If it's a substantiated report. 5 substantiatable (sic) report. 6 Q. Were you made aware of any instances in which 7 deputies were involved in domestic violence? 8 A. Yes. 9 Q. Tell me about those instances or that incident. 10 A. I don't -- there's an officer that had gone 11 out of town, for some reason, with another officer. 12 And when he got back into town, he discovered that 13 wife was with another gentleman at the Quaker Bar. 14 And because of the way he conducted himself, follow-up 15 service was no longer needed. His conduct was not 16 his wife. 17 Q. Is that the only one you can think of? 18 A. That's the only one that's coming to mind 19 right now, and I'm not saying that's the only one. 20 That's what's coming to mind right now. 21 Q. Did you make that recommendation? 22 A. Yes, ma'am. 23 Q. Were there any criminal charges brought 24 against that individual? 25</p>	<p>1 If a sheriff's officer murdered somebody in front 2 of another officer, then I think the arresting officer 3 doesn't have any discretion. 4 Q. So self-defense plays a role in 5 the scenario? 6 A. Yes, ma'am. And in that scenario, yes. 7 MS. ROBINSON: I think we can take a 8 five-minute break. I want to just review some 9 things and then see if -- you know, can we go 10 back to the record. 11 Recess in proceedings from 3:26 to 3:33 p.m. 12 BY MS. ROBINSON: 13 Q. Mr. Bullock, I have, like, a couple 14 follow-up questions, and this is just for my own 15 clarification. We talked about the canine incident 16 and the -- a report shows that it was Adam Hight, 17 the -- said the canine bit a woman. 18 And that was the woman who was in the 19 warehouse, correct? 20 A. Yes, ma'am. 21 Q. A civilian? 22 A. Yes, ma'am. 23 Q. Okay. It wasn't Adam Hight. 24 You also mentioned the domestic -- we talked</p>

Page 114	Page 116
<p>1 about the domestic violence situation.</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. And you recommended separation from</p> <p>4 employment?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Was that recommendation received?</p> <p>7 A. I gave a recommendation to the sheriff.</p> <p>8 Q. And the sheriff separated employment?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Do you recall the year of that?</p> <p>11 A. I do not.</p> <p>12 Q. Was that Sheriff White?</p> <p>13 A. Yes.</p> <p>14 Q. That was Sheriff White?</p> <p>15 A. Yes.</p> <p>16 MS. ROBINSON: I don't think I have any</p> <p>17 further questions at this moment.</p> <p>18 MR. GEIS: Okay. I have no questions at</p> <p>19 all. I guess we'll just reconvene tomorrow</p> <p>20 morning for Sheriff White's deposition.</p> <p>21 MS. ROBINSON: Okay. Well, thank you.</p> <p>22 (Whereupon, at 3:35 p.m., the taking of the deposition</p> <p>23 ceased. Signature was reserved.)</p> <p>24</p> <p>25</p>	<p>ERRATA PAGE</p> <p>List any corrections by page and line number on this sheet. If additional pages are necessary please furnish same and attach them to this errata page. You are allowed 30 days within which to complete the witness certification and errata pages. After completing these pages, please return them to:</p> <p>Advanced One Legal 1600 Market Street Suite 1700 Philadelphia, Pennsylvania 19103</p> <p>Case Name: White vs. Vance County, NC, et al. Witness Name: WELDON WALLACE BULLOCK Deposition Date: February 25, 2021 Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>Reason for Change _____ Page _____ Line _____ Change _____</p> <p>DATE _____ WELDON WALLACE BULLOCK</p>
<p>Page 115</p> <p>WITNESS CERTIFICATION</p> <p>I hereby acknowledge that I have read the foregoing transcript of my deposition testimony, and that my answers to the questions propounded, with the attached corrections or changes, if any, are true and correct.</p> <p>_____ DATE _____ WELDON WALLACE BULLOCK</p> <p>_____ PRINTED NAME _____</p> <p>Subscribed and sworn to on the _____ day of _____ 20____ before me.</p> <p>_____ Notary Public, in and for the State of _____</p> <p>WHITE</p> <p>vs.</p> <p>VANCE COUNTY, NC, et al.</p>	<p>Page 117</p> <p>CERTIFICATE OF REPORTER</p> <p>STATE OF NORTH CAROLINA) COUNTY OF MECKLENBURG)</p> <p>According to the emergency video notarization requirements contained in NCGS 10B-25, I, Janet Cooper Haas, RPR, Notary Public, do hereby certify that the identity of WELDON WALLACE BULLOCK was confirmed by me over Zoom, that the witness was located in Vance County, that the witness was remotely sworn by me prior to the taking of the foregoing deposition, that the parties were present as stated, that said deposition was taken and transcribed under my supervision and direction, and that I am not of counsel for or in the employment of any of the parties to this action, nor am I interested in the outcome of this action.</p> <p>Additionally, I certify that the foregoing 114 pages constitute a true and accurate transcript of the testimony, and that the witness reserved signature.</p> <p>This the 5th day of March 2021.</p> <p>_____ JANET COOPER HAAS, RPR NOTARY PUBLIC #19973240043</p>

Exhibits	11:01 21:19	2:06 76:5	
Exhibit 1 3:7 20:25 21:2	11:50 47:25	2:57 101:22	9
Exhibit 2 3:8 20:22	11:55 47:25	3	9 90:23,24
Exhibit 3 3:9 46:2, 11 71:2	12 84:25	3 46:2,11,12 50:2,4, 9 71:1,2	911 38:24 43:15 48:24 49:22,23
Exhibit 4 3:10 48:13,14 68:15 92:15	12:53 76:5	30 21:8	A
Exhibit 5 3:11 66:18,19 71:9	15 72:25 73:1	31 33:24	a.m. 21:19 47:25
Exhibit 6 3:12 84:2, 3	1801-3870 50:24	36 66:24 67:11	able 108:18
Exhibit 7 3:13 86:13,14	19- 104:1	37 66:21,24	about 5:16 6:8 7:10 11:19 13:14 16:24 18:8 19:10 21:17, 21 24:5,7,8,12,13, 20 30:22 31:12 33:18 35:10 36:14 37:5 40:12 41:13, 20 43:4,11 46:9 47:13 50:3 53:5,16 54:2 55:11 56:14, 16 57:13 58:2 59:7 60:4,25 62:3,4,15, 25 64:21 66:8 69:18 72:3 74:1 77:7,13,20 82:13, 17 83:2,3,7,9,22 86:19 91:3 93:14 96:18 98:12 101:7 102:4,6,7,20,24 103:7,10 107:7 111:9 113:16
Exhibit 8 3:15 89:2, 7,12	1967 5:9	3:01 101:22	above 50:12
Exhibit 9 3:16 90:23,24	1992 6:16 8:4	3:26 113:12	absence 14:8
\$	1997 6:22 8:6,8 32:13,20,24,25 33:16 94:14 99:11, 12,23 103:21 104:2	3:33 113:12	abuse 8:13 10:6
\$20 10:21	1998 99:24	4	accelerated 97:3
0	2	4 48:13,14 68:15 85:1 92:15	accidentally 67:18, 20
06 36:4,5	2 20:22 21:4 50:1,4, 9	5	according 12:11 65:9,13
1	20 107:7	5 66:18,19 71:9 72:25 73:1	
1 20:25 21:2,4 22:4 44:7 45:25 89:22 91:25	20-something 65:25	6	
1029 5:11	20/20 76:11,15 77:7,9	6 84:2,3	
10:35 21:19	200- 103:24	6th 91:3	
10B-25 4:2	2001 104:2	7	
	2004 8:22	7 86:13,14	
	2005 8:17,22	7-15-2009 45:20	
	2018 36:5 91:4 94:14	8	
	2019 65:24	8 89:2,7,12	
	23-page 22:9		
	28th 5:9		

accurate 89:14	70:25 80:6 89:20	always 5:12 26:23	21 14:3,4,6,10,12,
acted 97:19	100:18 103:6	56:6 59:8,12	17,22 15:4,9,14,25
acting 8:17	104:15	am 70:11	16:1,2,5,8,10,13,14
actions 48:9	against 48:10	ambulance 106:25	17:5,7,8,19 18:15,
109:25	111:25	107:13	18,22,25 19:9,17
actual 46:22 59:4	agency 85:13	amount 10:19	20:1,5,9 21:4,5,8,
90:5	agents 45:25 46:17	25:13 32:20 109:4	13,14,22,23 22:8,
actually 9:4 17:16	ago 21:8	ample 79:17	12,20,23 23:1,5,7,
55:4 60:12 65:18	ahead 27:13,14	an 6:13,21 8:16 9:1,	24 24:2,4,23 25:6,
76:3 89:9 90:2	28:6 31:9	19 10:18,22,23	9,12,14,19,20
101:4	aids 85:5,14	11:5 12:2,8,9 14:21	26:16,18,22,23
Adam 113:17,24	alarm 101:1	15:24 17:2,3 18:12	27:6,16,21,24 28:9,
add 35:18	alive 95:19	25:13,20,21 28:10,	12,13,20 29:11,15,
address 5:10	all 7:3 8:12,24	11,19 33:10,11	24 30:17,25 31:9,
admin 15:24	12:19 13:13 17:7	34:12 36:7 38:9,15	16,20,22 32:1,6
administration	21:12 24:2 25:14	39:4,8,9,10,11,12,	33:4,5,6,7,12
6:12 8:21 37:9	26:18,22 27:5,10	13,19,25 40:19,20	34:17,18,21 35:4
40:19	28:18 35:14 36:16	41:9,23,24 42:2	36:5,19,23 37:3,5,
administrative 9:1,	40:2,21 46:21 50:8,	44:7,8 46:1,23 48:2	10 38:2,9,13,22,25
4,5 26:15 37:11,12	11 54:25 56:15	53:10,23 54:13	39:1,2,3,18,23,24
40:20 41:23,24	59:7 61:21 63:4,23	60:6,9,16 64:19	40:6,7,17,18 41:1,
42:2 48:8 94:15	64:7 75:17 77:3,15	65:3 67:24,25 68:7,	7,9,11,14,15,16,17,
98:18	78:15 80:10 83:5,	8,11 70:2,6,8 73:7	20,22 42:1,5,9,15,
adverse 70:6,9	21 85:11 88:1	76:9 77:24 79:1	22,25 43:19,23
affairs 97:20 98:2,	93:15 97:15	80:25 82:1,2 83:18	44:1 45:10,18,21
21 99:6,7,18	108:11,21	85:15 89:14 92:5,9	46:19,22 47:3,7,8,
afford 46:23	allow 34:12	94:14 95:25 97:17	19 48:5 50:2,4,9,
after 6:2,10 15:14	allowed 73:16,17	98:2 100:12,22,23	13,24 51:7,15 52:3,
19:21 24:2,21	allows 69:10	102:9 103:12	4,5,9,11,25 53:6,
25:25 26:8 27:9	almost 15:1	104:6,20 106:5	17,20,21 54:11,19,
28:13 29:12 33:11	102:12,14	108:2 109:4,9	23,24 55:4,19,21
43:21 49:7,11 57:9	along 13:7	111:2,3,11 112:2,5,	56:15,23 57:5,6,7,
61:24 85:6 100:1	already 71:11	6,7,9,12	8,17,18,23 58:12,
afterwards 26:5	106:24	and 4:3,10,17,19	18,20,24 59:1,4,21,
again 16:12 25:22	also 4:10 16:22	5:8,21,25 6:6,13,	23 60:13 61:7,18,
27:12 28:9 43:14	20:13 32:25 64:14	14,15,22,25 7:8,11,	25 63:1,6,14,19,20,
56:5 63:12 64:15	80:1 97:16 113:25	18,20,23 8:1,4,5,7,	21,22 64:6,11,13,
		10,12,14,20,21,24	24 65:3,7,9,11,14,
		9:15,17,19,20	16,19,25 66:3,13,
		10:20,25 11:5,6,17,	14,24,25 67:17
		23 12:4,7,13,14,18,	68:15 69:1,9,13
		20,24 13:17,19,20,	70:15,17 71:8,23
			72:7,15,16,25 73:1,
			7,17,25 74:3,8,11,
			17,18,19 75:5,7,13,

19 76:9,13,16 77:16 78:7,9,10,16, 18,21,23 79:17,18, 19,24 80:18 81:2 82:4,5,17 83:16 84:1,8,16 85:15,24 86:12,23,24 88:10, 15,23 89:2,14,17, 22 90:6,7 91:1,4,6, 10,21 92:24 93:7, 13,22 94:24 95:1,2, 4,12,14,19,24 96:2, 10,11,14,15,16,17, 23,24,25 97:3,4,6, 16 98:4,8,25 99:4, 12,18 100:3,14,19, 24 101:1,3,11,19 102:8,14,16,21,24 103:4,5,6,9,10,11, 19 104:2,20,21,22, 23 105:4,22 106:23,24,25 107:1,2,3,6,7,10, 11,12,13,14,20,21, 22,23 108:8,11,13 109:13 110:15 111:13,15,20 112:20,23 113:6, 10,15,17,19 animal 78:20 94:25 animals 46:25 47:9 78:19 another 12:20 19:9 28:13 42:5 77:12 91:24 95:7,14 96:13 98:8 102:25 106:8 107:19 108:8 110:25 111:12,14 113:2 answer 4:16 7:24 11:9 37:25 39:20, 22 65:18 84:22 101:14 102:9 110:3	answered 72:2 answers 78:16 any 4:21 6:2 24:11 35:9,21 36:14 39:4 42:17 43:5,9,14,17 44:9,10 46:6,24 52:15 60:2 67:18 68:10 69:20,22 70:8,10,23 74:12, 25 75:1 79:22 80:9, 12,16 83:16 87:10, 12 88:7,21,23 92:8 93:13 94:1 97:15, 22,24 99:16,19 104:12 105:17 111:6,24 112:1,15 113:3 anybody 27:23 60:19 69:11 70:11, 21,23 anybody's 75:23 anyhow 31:10 anyone 61:14 anyplace 20:3 anything 5:2 11:19 35:16,17 41:2 57:9 58:2 67:22 69:10 75:5 82:19 83:2,3,7 104:16 109:11 AOC 23:2 33:24 apart 69:5 appear 105:2 appears 92:1 apples 110:10 applicant 12:7,8,9 25:5 28:6 30:22 34:12 applicants 18:14	application 12:2,5 17:3,11,14,19 18:15 19:22 21:2 24:5 33:10,11 46:23 applications 32:20 apply 110:9,11 appointed 98:7 apprehend 80:3 88:12 apprehended 92:10 approaches 74:19 approaching 102:15 approved 85:15 approximately 84:24 April 65:24 are 5:1 12:11 13:15 14:5,17 19:15 23:2 25:10 29:3 37:10 39:4,7,17,18,21 41:4,20 44:5,23 50:7,14,25 51:2 56:1,7 61:7,25 63:6,8,10 64:22 65:13 67:4 69:20 71:24 72:17 76:10, 25 78:23 82:21,23 84:13,24 86:12,17 87:16,21 89:17 90:7 93:8 94:1,22 98:3 108:18 109:19 110:21 112:9,11,13 area 80:25 96:23,24 100:23 aren't 25:2	arm 58:20 59:2,24 60:6,9,12,13,16,18 67:15 69:4 75:21 arms 74:18 arose 81:11 around 14:11 53:3 58:1 103:21 arrangements 62:13 arrest 72:1,11 74:2, 7,20 91:16 92:5 112:19 arrested 74:16,17, 18 112:24,25 arresting 85:13 113:2 arrests 71:20 as 4:4,9,18,19 6:9, 13,23 7:2,20 8:24 9:5,19 10:18 12:10 13:25 14:10,22 16:8,18,19,21 18:12 21:2 22:10 27:6 32:17 33:1 34:21 36:22,23 38:3 41:17 47:1,3 48:13 54:10 56:5, 21 57:6,20,22 63:17 65:10,15 66:17 68:3,14 69:16 73:23 78:11 85:5 86:13 89:2,12 91:5 92:12,15 93:5 94:23 97:1,17,19 99:1 100:4 103:20 107:24 108:9,20 Aside 36:11 ask 18:8 19:10 23:24 28:7 50:2 57:18,19 68:5
---	--	--	---

69:18 72:9 asked 21:22 37:5 53:19 60:25 71:21 86:19 102:20 asking 21:21 77:7 89:25 110:12 asks 4:16 aspect 37:3 assault 110:17,19 assaulted 92:22 Assaults 110:18 assigned 7:23 38:11,23 78:21 88:16,22 103:19 assignment 25:18 assistance 103:14, 15 assisting 94:25 associated 69:20, 23 asthma 70:18,21 at 6:6,7,16 7:3,16, 20 8:4,5 11:2,14,17 13:1,13 15:1 17:13, 20,21 21:8 24:23 25:2,23 26:1,20 27:5,15 28:12,17 34:3 35:8,24 36:2 37:4,19 38:4 39:3 40:2,16 45:1,7,13 49:23,24 52:16,22 53:10,14 54:17,25 55:1,2 61:21 62:6 65:18,20 66:24 68:1,25 70:13 75:3, 5,7 76:7,8 77:3,8 80:10,25 81:22 83:21 86:22 88:1 94:23 96:6 97:3	98:22,23 99:15 103:8,17 107:9,11 108:2,14 110:2,10 111:14 attack 74:5 attacked 80:15 attacks 70:16 attempting 92:7 attorney 62:14 audio 90:3 authority 76:15 available 25:2 average 42:18 aware 54:11 56:8 70:11 111:6 away 56:24 <hr/> B <hr/> B.9. 45:17 B.9l. 58:23 bachelor's 6:3 back 6:13 10:7 19:20 26:19,20,21, 22 27:13,14 28:13 32:2,5,6 33:6,11 47:11 50:2 51:22 53:6,12 65:3 68:14 70:5 71:5 74:18 76:22 78:8,9 82:20 91:7 92:14 93:15, 16 94:1,6,12 101:2 108:3 109:12 111:13 backed 107:2 background 12:6,7 17:6,17 19:23	20:14,16 21:22 23:4 24:21 26:4,6,8 28:21 33:23 34:8, 11,13,14 37:16 backgrounds 26:13 badly 103:13 bar 60:6,9,16,18 67:15 75:21 Barrel 111:14 Bartholomew 91:4 base 51:6 58:21 based 44:16,18 50:5,15 51:10,12, 14 61:5 84:22 85:24 basic 7:7,8 14:1 27:3 basically 53:2 60:11 basis 35:13,14,17 110:6 batons 65:11,15 be 4:11 13:21,25 14:20,25 16:16 17:22 18:16 24:18, 20 25:4,17,18 27:11 28:10,14 29:6,13 30:7,8,10, 14,18,19,23 32:11, 23 33:13 34:14 35:22 38:18,19,20, 25 39:5 41:7,12,16 42:4,5,10,22,24,25 44:1,3,4,20 46:3,5, 8 47:1 48:12 50:1 52:16 58:4 60:1 63:25 64:8,11,14, 16,22 65:1,3,5,6,8 67:9,17 68:4,25	70:18,19,20 73:5 75:22 76:13 77:24 78:12 79:7,13 83:15,19 84:2 85:6, 7,10,12,14,19,21 92:1,3 97:15 98:7 102:15 109:3,9,23 110:1,13 112:19, 24,25 bearing 77:10 became 36:4 53:5 because 15:1 17:16 24:25 25:6,23 27:1, 12 28:14 32:22 33:2 35:4,11 36:21 38:5 44:25 51:20 57:2 62:5 64:6,23 69:1,7 75:23 82:18, 21 97:15,18 104:6 106:24 107:4 111:15 become 83:6 been 4:3,12 7:17 10:1,12 12:25 13:1, 2,6,9 14:11,14,21 15:11 17:12 19:7 20:8,13 24:23 28:9, 16 31:15 32:12,14, 15 33:15,23 34:3 35:24 36:2,24 40:6 44:8 47:8 52:16,18, 20,21 54:5 61:8,9, 10 63:2,4 70:9,22 72:18,23 74:6,9 79:1 81:8,9,21,25 82:1 83:17 88:22 89:12 93:7,13 96:3, 6 98:5,19 99:22 100:9,18,19 103:22,23 104:19 105:1,20,22 106:12 107:6 108:13 111:2,3
---	--	--	--

<p>before 4:12 11:14 17:2,15 26:3,6 28:12 33:3 38:6 44:8,9,16,19 49:17 53:3 59:4 62:8,9 70:3 84:23 90:15 94:9 97:12 103:4,5 104:1 105:20 106:12 109:9</p> <p>beginning 34:25</p> <p>behaved 103:13</p> <p>behind 65:2 74:18</p> <p>being 27:6 34:13 36:5 55:5 62:12 75:24 86:20 101:11</p> <p>believe 9:2 13:4 18:16 77:18 112:11</p> <p>believed 68:25</p> <p>believes 92:3,6</p> <p>bent 60:8 67:14</p> <p>Bertie 23:18</p> <p>better 106:6</p> <p>between 52:2 72:25 103:6 104:1,2</p> <p>big 40:4</p> <p>birthdate 5:8</p> <p>bit 11:16 19:4 39:13 42:20 69:6 75:22 76:10 80:24 81:2 85:19,22 86:20,24, 25 98:13 107:5 113:18</p> <p>bite 80:22</p> <p>bitten 79:8,9,20,23 80:17 82:4</p> <p>BLET 13:19,21 14:11 66:8,9,12</p>	<p>71:8,22,25 72:3,7, 11,14 75:12</p> <p>BLET's 71:19</p> <p>blocked 106:25</p> <p>board 108:24,25 109:1,2,4</p> <p>bone 69:4</p> <p>both 54:17</p> <p>bottom 45:7,12 46:13</p> <p>brakes 107:12</p> <p>Brame 11:22</p> <p>brandished 64:4</p> <p>brandishing 59:4</p> <p>break 21:14,16,17 67:1 76:3 109:16 113:9</p> <p>break-in 39:9 101:3,4</p> <p>break-ins 10:5</p> <p>brief 5:14</p> <p>briefly 6:4,13</p> <p>bring 86:3</p> <p>broke 50:8 58:20 59:1,24 100:25 108:9</p> <p>brought 79:13 111:24</p> <p>building 80:24</p> <p>buildup 109:11</p> <p>bulk 14:6</p> <p>bull 35:4</p> <p>bullet 46:19 85:4</p> <p>Bullock 4:2,7,23,24</p>	<p>5:7 18:6 21:21 22:12 37:18 45:14 48:2 61:19,23 76:7 87:21 89:11 90:10 101:24 109:15 113:14</p> <p>Bullock's 87:18 89:4</p> <p>Bullocks 4:25</p> <p>burglarized 100:25</p> <p>bust 83:23</p> <p>but 4:8 6:5 8:13,18, 19 10:23 11:13 12:19,22 13:2,9 14:1,14 15:2,4 16:17,21 17:15 23:25 25:22 26:13, 22 27:8,22,25 30:5 32:7 33:7,22 34:2, 19,24 35:7 37:5 41:2 42:22 47:13 49:9,23 50:3 51:10, 16 52:15,18 54:11, 18 55:24 56:8,13 57:4 61:22 62:4 64:4,10 66:5 68:25 70:14 71:18 74:21 76:15,23 77:11 79:24 80:23 81:12 82:4,5,17 83:3,20 84:15,18 88:2,9 89:20 95:21 96:22 99:19,23,25 102:17 103:5 104:4 105:5, 20 106:4,10,12 107:17 108:11,20</p> <p>by 4:6 6:11 18:19 19:5,13 21:20 22:2, 7 30:11 35:4 36:25 37:24 38:10,13 39:13 42:24,25 43:8 45:4 46:15</p>	<p>47:1,18 48:1,15 55:14 60:11 64:14 66:20 67:6 71:10 73:15 74:4,17 76:6, 21 78:5 80:24 82:7 84:4,12 85:8,10,15 86:8,16 87:20 88:15,16,22 89:8 90:8,9,20,25 91:9 92:7,8 98:7 99:12 101:17,23 103:4 106:25 110:10 113:13</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>calculated 94:14</p> <p>call 34:16 41:17 54:13 59:9 87:24 101:1</p> <p>called 15:4 38:19, 21 53:10 61:25 79:17 97:23 110:25</p> <p>calls 7:24 14:6 63:18</p> <p>came 6:13 8:19,20 17:1 28:13 33:11, 14 53:12 61:24 81:4,11 93:14 95:1 96:10 97:2 98:25 99:1 107:9,12</p> <p>can 5:10,19 6:8 7:22 10:16 13:11 16:25 17:21,24,25 18:3,4,5,11,17,23, 25 19:14 20:21 21:25 22:3,5,11,15, 17 23:1,9 24:19 25:14 26:10,11 29:9 30:22 31:12 34:7 36:7 37:21,25 38:20,22 39:22</p>
--	--	---	---

42:24,25 43:4 45:2, 7,10 47:6,16,19 48:5,19 53:1 55:11, 16,17,19 57:14,15 58:9,18 60:9 63:15 66:21,22 67:1,7,17, 24 68:7 72:22 73:1 74:1,15 76:3,4,12, 16 78:3 79:4 80:13 83:4 85:1 86:1 89:1 90:14,17,18 91:6, 17 94:9,22 99:17 100:20 102:15 104:10 105:5,7 106:20 109:13 110:15,18 111:18 112:4 113:8,10 can't 11:9 26:11,12 27:18 36:14 42:14 45:15 47:8 55:24 63:13 65:18 66:2 68:3 70:14 74:16 79:22 90:18 91:17 110:3,11 candidate 13:23 14:11 canine 77:23,24 78:7,20 79:2,7,13, 19,21 80:15,17 81:9,13 82:2 83:2, 5,6,10,13,18,19,25 85:11,19,22,24 86:4 113:16,18 canines 77:21,22 79:15,25 80:1,4,7 82:4,21 83:2,23 84:5 85:17 cannot 32:21 Capsicum 46:20 captain 12:20,25 13:2,16 15:24 16:18,19 49:14,21	55:15 58:11 75:5, 18 93:23 98:23 99:13 100:1,11 103:17,18 captains 16:2 car 39:24 53:2 74:10,11 95:7 96:12 107:1 108:3, 4,6 card 27:1 career 6:8 8:7 98:18 Carolina 5:11,13, 18,24 6:7 20:9,11 23:11,16,17,18,19, 20,21 carry 47:6 cars 25:2 107:1,13 case 25:17 26:9 43:10 70:19 85:8, 10 103:19 case-by-case 110:5 cases 8:12 10:2,3,6 64:17 79:21 85:7, 12 caught 25:10 26:20 caused 69:3,8 73:4 causing 107:17 Central 5:24 6:7 certain 27:25 64:17 66:14 79:12 109:22 certainly 59:23 certificate 27:4 certifications 25:7 certified 88:2	chance 45:24 46:16 89:11 change 11:16 35:1 charge 9:16 37:9, 16 83:13,17,19,21 charged 101:11 charges 24:12 96:7 111:24 chase 39:11 95:8 96:11,15,18,21,22 check 12:6,7 17:6, 17 19:23 20:14,16 21:14 24:21 34:8, 11,13 53:14 checked 54:10 56:7 chemical 45:24 46:16 71:12 74:13 chief 16:1,2,3,4,7,8, 21 child 8:13 10:5 chin 75:22,24 Chowan 23:18 Chris 22:5 47:21 89:1 101:15 circumstances 12:11 27:25 42:12 112:21 citizen 67:21 70:6,8 79:2 95:16 105:17 112:18 citizens 104:10 105:14 110:13 city 107:21 civil 6:24,25 9:3 15:7,8,10 37:15 82:9,18	civilian 87:1 113:22 clarification 113:16 clarify 78:10 class 89:22 99:18 classes 99:16 classroom 91:13 clavicle 73:6,11,15 clearly 78:11 clerk 20:3,5 34:17 clerks 23:3 26:20 close 67:16 club 108:2 coffee 47:23 colleague 4:10 collected 9:14 college 5:21,23 6:10 18:25 come 10:7 12:9 17:4 25:14 26:5,13, 14,15,16 38:2,5 39:2 40:14,25 41:3, 19 42:7 47:10 50:2 58:24 74:11 81:10 82:17 93:16 97:16 103:4 104:24 come-along 60:8 comes 25:5 70:11 comfortable 84:21 coming 9:8 24:17 33:4 35:11 67:22 94:1,6,11,22 96:14 111:19,21 command 15:15 103:2 commander 15:23,
--	--	---	--

24 81:20,21 committed 42:17 96:1,5 common 74:21 101:12 106:3 compare 68:3 compiled 27:6 51:14 compiling 26:23 complain 73:22 complained 104:11 complaint 49:1,3,5, 12 92:16 110:13 complaints 104:19 105:5,8 109:8 complete 6:5 12:13 56:21 completed 7:8 56:22,23 57:17 70:2 103:8 completion 43:6 computer 27:16 concealed 37:14 concept 76:11,22, 25 77:7 concerning 42:3 conclude 60:22 conclusion 50:10 51:10 52:4 58:19, 24 60:21 68:20 conclusions 50:12 concrete 28:23 conduct 92:8 98:4, 14 111:16 conducted 19:22	48:25 61:1 81:12 100:3 111:15 conducting 48:20 confronted 53:4 confuse 4:24 confusion 4:20 conjunction 77:21 consequences 44:13 consider 14:23 68:2,4 considered 81:9 82:22,23,24 83:1 104:9 108:20 consist 42:1 contact 40:16 41:12 53:9,11 contained 48:7 continue 17:25 continued 9:7 52:11 continuum 44:6 63:11,17,19,24 64:22 65:9,14,17, 19 71:16 72:1,12 contract 19:15,20 contrary 69:3,7,13, 17 control 11:3 59:25 60:1,5 67:16 71:19 72:1,11 73:14 75:25 78:18,22,23 95:1 controlled 85:5,9, 11,16,23 convene 43:10,13	109:2 convened 27:9 30:17 convening 30:20 conversation 41:13 51:8,11,25 52:1,8 53:21,24 56:12,14, 17,20,25 62:17,21 102:1 conversations 50:3 51:5,19,23 93:16 94:1 convicted 93:7,13 96:3,6 conviction 92:12 conviction] 93:6 convictions 96:4 cooperative 53:14 copy 26:25 corner 45:14,15 correct 23:22 29:19 30:12,20 31:8 44:22,24 50:16 58:4,6 59:5,6 61:2 65:11 70:18 71:13 75:8 82:22 87:22 88:15 89:15,23 92:19,22,25 93:19 102:22,23 108:19 113:20 could 27:23 32:19 35:18 38:19,25 39:14 44:3,4,20 46:12 59:21,24,25 60:6,7 65:6,8 68:22,23 69:18 70:18 76:23 79:7 92:25 104:19,25	couldn't 32:13 53:20 counties 24:3 county 6:14,16 7:8 8:5 10:13 11:2,14, 18 13:12 23:7,9,10, 11,12,13,16,17,18, 19,20,21,22 25:1 35:2 45:8,9 58:14 66:7,11 71:18,21, 24 72:3,7,10,14 75:7,10 76:15 78:6 82:10 85:10,16 87:13 88:17,19,22, 25 89:18 96:2 98:2 100:23 101:13 103:8 104:11 105:11 County's 45:22 couple 113:14 court 8:1 9:22 10:2 33:20,21,22 37:17 76:15 85:7 courthouse 25:12 courts 20:3,6 23:3 26:15 85:6 Cracker 111:14 created 33:3 criminal 6:1 8:2,11, 12 9:6 10:2,3 12:6 14:20 17:6 19:23 20:2,5,10,14 23:4 24:3,11 34:8,11 37:15 111:24 criminally 101:11 criteria 79:6 cuff 60:14 current 11:17,19
---	--	--	---

<p>custody 79:6,8 92:6,12 93:5</p> <p>customary 88:18</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>danger 69:22</p> <p>dangers 69:20</p> <p>data 43:15,16</p> <p>date 8:23 45:18 49:7 52:5</p> <p>dates 8:19</p> <p>day 37:19,22 49:6 52:4 53:3,13,23</p> <p>day-to-day 35:13, 14,17</p> <p>days 40:15</p> <p>DCI 20:1 26:16 37:14</p> <p>dead 95:19 108:14</p> <p>deadly 63:22,25 64:2,24 91:10,24 92:4,7,25 93:11 94:16,19 95:9 96:13</p> <p>death 92:9</p> <p>debris 40:4</p> <p>decision 16:16 17:8 50:5,15 58:21 77:10,11 103:20</p> <p>decisions 16:10, 13,14</p> <p>decline 107:5</p> <p>defend 92:2</p> <p>define 48:5</p> <p>definitely 16:21</p>	<p>degree 6:3</p> <p>degrees 26:25</p> <p>delay 92:11</p> <p>delayed 42:24,25</p> <p>demote 44:4</p> <p>department 28:18 35:9 36:18 38:11, 17 97:20 98:3 100:14,16,17 105:11</p> <p>departure 59:8</p> <p>depending 25:5 40:24 41:18 98:5</p> <p>depends 27:14,24, 25 42:11 110:19 112:21</p> <p>deploying 88:10</p> <p>deposed 4:12 9:25 10:1</p> <p>deputies 9:13 14:5, 18 15:4,9,19 32:10 39:1 46:21 65:4 72:7 78:18 79:25 96:24 97:2 110:21 111:7</p> <p>deputy 6:9,19,20, 23,24 7:2,20 11:6 12:1 13:15,16 14:4, 10,13,22 16:1,2,3, 4,7,8,22 25:17 26:1 46:23 48:9 58:4,13 64:6 67:20 68:21, 23,24 69:2,18 75:3 94:25 95:2 96:10, 11,12 97:3,4,6,12 100:23 106:21 107:20 110:25 111:1</p> <p>deputy's 109:25</p>	<p>describe 79:4</p> <p>describes 67:8,10</p> <p>designate 85:9</p> <p>designated 12:17</p> <p>desk 82:6 104:24</p> <p>details 56:13 80:23 87:5</p> <p>detect 85:24</p> <p>detective 14:22,25 15:6 98:8</p> <p>detectives 14:20 15:11 98:6</p> <p>determine 30:18,23</p> <p>determined 100:24 101:3</p> <p>did 4:8 5:16,21,22, 23,25 6:2,10 7:5,20 9:3,4,22,24 10:9 11:10,13 16:1 17:6, 11,15,17 19:25 24:5 30:8,13 31:1, 4,18,22 33:1 34:7,8 35:19,20 36:7 44:13,15,16 49:4, 10 51:5,6,25 52:13, 14,15,25 53:10,21 54:7 55:8 56:12 57:15,18,23 58:7, 21,24 60:16,21 61:13,22 62:11 65:22 71:21 73:22 74:4,25 77:3,8,15, 18 78:8 81:3 87:13, 15 97:12 98:14 99:10,16 100:6,8, 20 101:4,8,15 102:1 103:14,15 104:24 107:15 111:22</p>	<p>didn't 6:5 11:10 21:7 30:10,14 34:19,20 35:4,21, 22 36:9,19 41:2 46:6 57:8,18 59:19 62:5 88:6 95:20,21 102:21,24,25 105:18 107:18 109:19</p> <p>die 95:20,21</p> <p>difference 61:11</p> <p>different 13:6 26:14 37:6 83:15 110:7,8</p> <p>differently 59:22 76:23</p> <p>direct 51:5,8,11 66:13 103:1</p> <p>directed 104:20</p> <p>directing 107:3</p> <p>direction 88:19,24</p> <p>directive 45:13,17 58:23</p> <p>directly 16:4 35:16</p> <p>discharge 107:16</p> <p>discharged 63:25</p> <p>disclosed 19:7</p> <p>discovered 111:13</p> <p>discretion 112:2,5, 6,7,8,10,12,16 113:3</p> <p>discuss 11:17 61:13</p> <p>discussed 31:14 61:18,19 62:10,22, 24 63:7,8 71:11</p> <p>discussion 101:21</p>
---	--	--	--

discussions 61:22 63:4 dismissed 109:9, 23 110:1 dispersant 71:12 dispersants 74:13 disposal 68:25 disposition 85:7 district 7:23 division 6:24,25 9:3 15:8,10,17 17:10 35:12 37:7,8, 10,12,17 103:1 divisions 37:10 DMV 26:17 do 7:25 12:5,23 13:24 14:6 17:24 18:20 21:13 22:20 25:9 26:12 27:20, 22,23 28:1,8 30:13 31:4 34:9,19 35:8,9 38:2 40:2 41:2,20, 22 42:6,21 43:7,22 46:13,19 48:16 49:4,18 50:6,18 55:11 56:13,20 57:1,3,9 59:8,13 60:15,17 61:4 62:16,19 68:20 70:10,24 71:18 73:6,10 74:4,23 76:1,10 78:18 80:4, 7 81:5,7 82:19,20 83:9,12 84:5,18 87:7,8,9 89:5 90:15 91:1 97:13,16,17 98:9,12 99:20 101:2,7,8 102:18 105:10,23 106:7,17 110:7	document 17:21 18:9,11,12 19:10, 19 22:1,3,9,20 23:14,15 47:20,22 48:3,5,17 51:16 58:8 86:13 89:10 90:15,17 91:1,2 documentation 43:17 documents 21:10 22:21,24 23:1 24:1 26:25 27:10 43:18 48:7 49:16 55:20 does 9:12 11:23 29:9 37:11 38:13, 14,15 42:9 47:4 63:23 66:7,11 69:14 71:25 72:6, 10,14 75:10 78:6 82:15 84:17 85:16 98:2 112:2 doesn't 29:25 60:18 69:12 106:8 112:7,15 113:3 dog 39:13 78:22 79:8,9 80:21,24 86:22,24,25 95:1 dogs 78:24 105:4 doing 9:2,7 16:18, 21 32:12 33:14,15 35:4 57:2 80:25 98:18,21 99:2,4 100:10 103:18 105:6,8 109:20 domestic 110:21 111:1,7 113:25 don't 4:24 7:18 8:18 9:19 11:19,20, 21,22 12:18,21,24 16:16 17:4,15 20:24 24:9 27:14	28:5 30:4,15 32:7, 8,12 34:24 35:12, 15,17 37:21,22 39:19,20,21 40:1 42:15,16,22 43:1,2, 7 44:11,25 45:16 49:6,9,23 51:4 52:4,5,14,15,17,21, 23,24 53:1,2,22,25 54:8,11,14,15,19 55:7,10 56:4,5,8,13 57:24,25 58:1,5 59:9,12 61:6,10,11, 20 62:4,18,20 63:2, 16 65:17,20 66:2,5 67:9,22 68:2,10,13 69:9 70:8,10,19,20, 21,22,23 71:14,17 72:16 75:15,23 77:22 80:9,20,23 81:4 83:2,3,7,16,20 86:1,6 87:4,6,11 88:9,13,21 94:18 96:4,21 97:14 98:10 99:18,23,24, 25 100:16 101:14 104:15,16,25 105:2,13,19,20,23 106:7 108:9,19,20 109:17,24 110:9,23 111:11 112:1,4 done 12:5 13:3,4,5 14:1 23:25 26:18 28:10,23 33:2 34:2, 4,13,14,15 35:5 57:4,5 59:22 60:6,7 76:23 98:20 102:12,14,15 109:10 110:5 down 10:20 17:4 19:4,9 22:13,15 27:15 31:20 33:5 39:23 42:7 52:9 60:3,13,17 71:3,4	84:9 90:16,17 101:2 107:4,7,11 drafting 48:17 draw 41:5 64:11 drew 41:1,2 64:19 drill 4:15 driver 53:5 driver's 24:13 27:1 driving 20:2,13 24:4 39:23 106:22 drop 95:3 drove 107:22,23 drug 6:11 10:16 15:12 79:22,24 83:23 drug-sniffing 80:2 drugs 80:5,8 85:25 dual 80:1 due 35:1 duly 4:3 Durham 5:11 36:13,18 during 32:3 52:8 56:6 63:4 80:24 83:23 duties 8:25 13:8 38:3 duty 107:17 <hr/> E <hr/> each 23:7 78:20 109:10 earlier 59:3 60:25 77:19 86:19 100:10 102:21
--	---	---	---

<p>early 9:5 34:16 73:16 77:20 98:17 100:19 103:25</p> <p>ease 4:17</p> <p>easily 105:3</p> <p>education 6:2,5 20:8</p> <p>effect 58:16 70:22 92:5 106:5</p> <p>effective 45:18</p> <p>effects 46:24</p> <p>egregious 44:21 82:3</p> <p>either 8:22 20:3 51:13 54:16 102:24</p> <p>else 11:10 27:23 41:2 42:6 75:6 81:17</p> <p>email 21:6,15</p> <p>emails 21:7,8</p> <p>employ 78:7</p> <p>employed 48:20 68:9,12</p> <p>employees 15:3</p> <p>employment 19:16 21:3 24:6,8,13,22 35:10 37:4,20 59:10</p> <p>employs 71:19</p> <p>encompass 99:7,9</p> <p>end 65:23 91:21</p> <p>ended 53:11 65:19 101:11 107:17</p> <p>enforce 112:3,10, 12,16,17</p>	<p>enforcement 6:11 7:7,9 13:13,14 14:1 27:2,4 60:2 65:19, 22 91:16,21,23</p> <p>engage 40:17</p> <p>engagements 40:13</p> <p>enough 14:12 40:4 44:21 104:4</p> <p>ensued 96:11,15</p> <p>entail 19:25</p> <p>entailed 7:22</p> <p>entity 85:13</p> <p>envelope 10:18,19, 20</p> <p>escalation 44:10</p> <p>escape 92:5,7,11 93:4</p> <p>evaluates 47:3</p> <p>evaluation 77:4</p> <p>even 10:25 11:3 27:24 33:10 34:4, 16 64:4 70:17 104:23</p> <p>eventually 17:9 42:6 104:24</p> <p>ever 4:12 9:22 10:9, 12 11:13 28:3 68:7, 11 70:6 74:12 79:1 83:24 100:6,8</p> <p>every 12:22 28:23 66:3</p> <p>everybody 4:16 25:22</p> <p>everything 43:21 51:12,14 107:22</p>	<p>evidence 9:3,11,14, 16 10:8,10,11,12, 24,25 11:1,4,7,8,12 37:15 107:19</p> <p>exact 52:5 66:6 71:7 99:25</p> <p>exactly 49:10 52:4 56:8 63:14</p> <p>EXAMINATION 4:5</p> <p>examined 4:3</p> <p>example 28:10 65:4</p> <p>examples 39:17,18, 21</p> <p>except 57:11</p> <p>excessive 70:2 76:9 81:9 82:9</p> <p>excitedly 70:15</p> <p>exhibit 20:22,25 21:2 24:1 46:1,2,11 48:13,14 66:15,18, 19 68:15 71:2,9 84:2,3 86:5,6,13,14 89:2,7,12 90:23,24 92:15</p> <p>exhibits 21:4 46:4, 6,9</p> <p>exist 84:17</p> <p>existed 87:5</p> <p>exists 84:14,15,19</p> <p>exonerate 44:3</p> <p>exonerated 61:9 95:13,14 96:13,17 97:6,13,15 108:21</p> <p>expected 40:6</p> <p>experience 14:11 66:1</p>	<p>experienced 69:22, 24</p> <p>explain 7:22 16:25 26:9 42:1 48:19 58:18 60:9 63:17 72:22 73:1,13 74:15 76:12 106:20</p> <p>explained 77:1</p> <p>explaining 108:15</p> <p>extensive 20:15,17 21:23,24 40:24</p> <p>extensively 17:16</p> <p>extent 56:25 87:6 108:18</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>F-3 12:4 17:3</p> <p>fact 33:1</p> <p>factor 77:3</p> <p>factual 52:16</p> <p>faded 63:13</p> <p>failure 107:16</p> <p>fair 19:6 51:17,20 52:7 94:13</p> <p>familiar 28:15 44:23,24 63:10 76:11,25 84:13,15, 18 85:18 86:17 89:17,19,20,21</p> <p>far 10:18 99:1 103:6 107:18</p> <p>fashion 9:20 22:14 34:14</p> <p>fatality 95:21</p> <p>favours 110:13</p>
---	---	--	---

<p>federal 85:13</p> <p>feel 35:19,21 41:15 59:14,15,17 78:15</p> <p>feeling 59:17,19</p> <p>fell 27:19</p> <p>felon 93:2</p> <p>felons 79:16</p> <p>felony 79:14 92:13, 18 93:6,10,13</p> <p>felt 40:18 44:21 82:1,2</p> <p>few 22:8,9 67:19 103:6</p> <p>field 90:2,5,6</p> <p>fight 108:1</p> <p>fighting 108:5</p> <p>figure 38:25</p> <p>filed 49:1,3,5,11 104:11</p> <p>filled 17:2</p> <p>final 29:25 30:1 85:6</p> <p>find 71:7 110:7</p> <p>fine 4:23 86:2 109:21</p> <p>fingerprints 37:16</p> <p>finish 14:4 29:12 91:17 102:8</p> <p>finished 7:12 43:21 55:21</p> <p>fire 96:12</p> <p>firearm 63:23 89:23</p> <p>firearms 89:17 91:14</p>	<p>fired 31:15 96:12, 16 97:5 101:11</p> <p>first 6:21 17:13,14 29:4,11 35:22 36:6 50:7,8 53:10,15 54:1,4,19 62:25 67:14 85:3 90:15 98:18,21 99:2 112:22</p> <p>first-line 14:16</p> <p>first-time 44:20</p> <p>fit 25:1 63:23</p> <p>five 32:18 106:15</p> <p>five-minute 113:9</p> <p>flare 104:18</p> <p>flares 107:2</p> <p>flip 57:6</p> <p>follow 66:8,12 71:21,22,25 72:11, 14</p> <p>follow-up 84:20 113:15</p> <p>following 53:12,13 72:3</p> <p>follows 4:4</p> <p>foot 108:9</p> <p>for 4:17,21 5:5,14 6:14,25 7:10,11,14 11:11,22 12:8,9 13:23 15:25 17:4, 24 18:22 19:1,16, 19 20:9 21:2,4 23:4,5,6 24:8 25:8, 11,13,18 26:25 27:25 28:8,10,17, 20 29:1,10,20 31:1, 15 36:9 37:13 40:1, 9,18 41:12 46:11,</p>	<p>25 47:13 48:14 54:15 55:20 62:2, 14 66:19 67:25 71:5,12 74:24 76:3, 14 78:16 79:16 80:2,5 84:3 85:3,11 86:14 88:11 89:7, 18,23 90:14,24 91:17,24 92:13 93:8 96:1,8,22 100:3,5,19 101:20 102:8,9,16 104:4, 17 106:3,4,5 107:7, 11,15 108:14,15 109:7 110:4,24 111:12 113:15</p> <p>force 39:12 40:11 42:8 47:4 48:9 63:22 64:1,2,24,25 70:1,2 71:16 72:19 73:5 75:11 76:9 77:23 81:9 82:10 91:10,15,24 92:4, 25 93:11 94:16,19 95:10 96:13 97:21 99:8,9</p> <p>form 9:20 12:4 17:23 18:13 33:20, 21,22,25 34:14 38:21</p> <p>formal 29:6</p> <p>formally 34:20</p> <p>format 33:13</p> <p>forms 23:2 26:14 33:2,3 38:19</p> <p>formulating 32:22</p> <p>found 91:3</p> <p>four 101:9 106:15</p> <p>fourth 67:16</p> <p>fracture 69:4,8</p>	<p>frame 42:15</p> <p>Franklin 23:17</p> <p>free 5:2 78:15</p> <p>fresh 80:20,22 81:1</p> <p>friend 104:9</p> <p>from 6:22 8:2 10:5, 23 13:14,17 14:24 20:3,4,5 21:19 23:6 31:15 36:11,13,17 43:5,15,16 45:12 47:25 48:8,23,24 49:22 59:10 75:6 76:5 82:9 85:9,12 89:5 92:3,5,11 93:5 94:10,14 96:25 100:13 101:22 102:25 103:1,9 108:5 109:23 110:13 111:2 113:12</p> <p>front 45:16 65:5 68:17 84:6,25 112:14 113:1</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>gather 18:13 30:21 42:3 43:15,16,18</p> <p>gathered 27:6 48:21 49:16</p> <p>gathering 55:20</p> <p>gave 79:17</p> <p>gears 11:16</p> <p>Geis 20:24 21:6,7, 16 22:6 36:14 37:23 46:1,3,8,12 47:24 61:18,20 63:1 66:14,15,25 67:2,4 76:16,18,20 86:5 89:1,3,5</p>
---	--	---	---

<p>101:14</p> <p>general 24:10 68:6</p> <p>generally 26:12 57:12</p> <p>generate 40:19</p> <p>generated 38:10,24 111:2</p> <p>gentleman 111:14</p> <p>gentlemen 32:4</p> <p>get 19:20 21:7 25:14,23 26:22 27:7,13,14 28:5,21 30:2 33:11 39:24 40:6 41:14 44:14, 15 45:2 47:16,22 49:22 53:16 59:17, 25 62:6 70:5,12 73:14 74:8,10 102:11 107:18 108:4,22 109:4</p> <p>get all 29:24</p> <p>gets 97:20</p> <p>getting 26:21 42:24 52:2</p> <p>gist 62:15</p> <p>give 22:8,9 24:14 32:17 71:6</p> <p>given 7:24 83:16</p> <p>gives 91:13</p> <p>giving 57:17</p> <p>glad 97:18</p> <p>glass 108:3,10</p> <p>glasses 69:1</p> <p>go 5:16,21,23 9:22 10:2 12:3 13:21 18:3,4,5 19:3,4,9</p>	<p>20:1,2 22:4 23:7 24:10,24 25:8,15, 18,21 32:2,5,6 34:19 38:3,7,8 40:21 42:5 47:22 50:1,4 51:22,25 57:5 62:12 66:22 68:14 71:3,5 72:7 75:13,21,24 76:1,4, 18 78:10 81:17 82:20 83:6 84:9 85:1 91:7 92:14 101:20 104:16,17 107:20 113:10</p> <p>God 46:6 106:6</p> <p>goes 25:16 79:19</p> <p>going 4:7 10:7 12:4 13:18 17:18 18:2,3 19:12 20:22 22:8,9 23:6,24 27:6 29:23 31:25 33:4,5 40:17 41:15 47:10,22 50:2 56:8 66:12,23 79:18 90:5 96:24 98:20 99:17,19 102:8,11 105:23 106:4,9,10 109:12, 13</p> <p>gone 13:19 24:25 35:15 104:21 111:11</p> <p>good 4:7 36:24</p> <p>Goolsby 49:20 54:6,24 55:4,16,19 56:3 58:12 77:16 93:18,21</p> <p>got 11:6,11 17:7,9 33:6 34:18 39:9,10, 11,12,13 53:6 56:10 62:6,7,8,9,12 63:20 64:23 80:24 81:2 86:24 96:11,</p>	<p>23 102:9 107:22 108:1 111:13</p> <p>gotten 20:7 26:19, 20 27:3 51:12</p> <p>grabbed 74:17</p> <p>grabbing 65:1</p> <p>graduated 20:4</p> <p>grazed 97:11</p> <p>Gregory 36:13</p> <p>grievances 104:12</p> <p>ground 59:1 60:3, 13,18,21,24 68:3, 24</p> <p>guess 107:16 108:19</p> <p>guiding 65:6</p> <p>gun 10:22 11:6 37:14 41:1,2,5 64:7,10,19 87:18, 22,24 88:2,6,10,15 89:4</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>had 7:11 8:17 10:12 11:2 15:17,23,24 16:2 17:3,16 19:7 20:7,9 24:10 25:8 26:3,24 27:3,15,21, 22 31:14,16 32:20 33:12 34:6,14,20 35:24 36:2 42:19, 20 43:21 44:7,8,19 45:24 46:16 48:2 51:1,3,8,12 52:10 56:17 64:23 70:6, 17,21,22 73:6,23 74:2,3,7,11 75:3,4 77:12 79:5,16,21 80:1,21 81:2 85:23</p>	<p>86:22 89:11 94:16, 25 96:1,3,6,8 98:6 100:1,9,11,21 103:12,22 104:6 105:24 106:22,24 107:6,21,24 108:1 109:9 111:11</p> <p>hadn't 14:1 93:7</p> <p>half 53:23</p> <p>Hampshire 23:12, 13</p> <p>hand 33:8 65:2 74:18</p> <p>handcuffing 65:3</p> <p>handcuffs 53:15,17 65:5</p> <p>handgun 37:14</p> <p>handle 105:5,7</p> <p>handled 104:22</p> <p>handler 78:20,21 80:17,22 81:3,5 82:2 83:7</p> <p>handler's 78:21</p> <p>handlers 78:7,23 81:13</p> <p>handout 90:12 91:11</p> <p>hands 63:20 64:11, 22,24 65:1,2,4,6,8, 10 74:20,23</p> <p>haphazardly 33:3</p> <p>happen 11:14 105:24</p> <p>happened 8:7 26:9 39:1 41:21 43:18 52:11 66:3 87:6 108:2</p>
---	---	--	---

<p>happens 25:4,23</p> <p>hard 63:20</p> <p>harmful 70:18,22</p> <p>has 13:3,4,5 14:10, 11,14 25:22 29:22, 25 48:12 63:13 65:19 66:3,14 67:20 68:25 70:6, 21 75:22 79:1,8,9 80:15,17 81:9,10, 25 82:2 83:17 84:1 89:12 93:8 98:19 100:9,11 105:12,17 106:5 112:5,6,9,12</p> <p>hasn't 82:1,5 93:13</p> <p>have 4:9,12,15 5:1, 12 7:17 12:2,25 13:1,2,6,7,18 14:9, 21 15:2,5,7,8,9,11, 12,15 16:1 17:12 19:9,11 20:1,2,8,9, 13 21:13 24:5,12, 23,25 25:1,7,9,10, 19 26:3,5,6,18,19, 24 27:3,9 28:6,7, 14,16,19 30:1 32:10,12,13,14,15, 22 33:23 34:3,10 35:15,17 36:24 38:22 39:8,19,25 40:2,5 41:13,18 42:15,17,22 43:1,2 44:25 45:16,24 46:16 47:7 49:14, 15,23 51:5 52:1,14, 16,18,20,21 54:5,9 57:8 59:22,23,24, 25 60:2,6,7,11 61:1,6,8,9,10,13,22 62:22 63:4,12,22 64:5,8,12,24 65:17, 20 67:20,22 68:7, 11,16,17,18,19,22,</p>	<p>23 69:10,17,19,22, 23,25 70:2,9,23 71:22 72:18,23 73:5 74:6,12 75:12, 13 76:1,23 78:3 79:16 80:9 81:8,15, 21 82:4,11,19 83:5, 24 84:5 88:7,9,13, 21,23,25 89:5,11 90:10 91:3 92:25 98:2,4,9,14 99:22 100:12,18 102:1, 18,21 103:23,25 104:11,15,16,19, 21,22,25 105:1,10, 16,21 106:7,10 108:17 110:7,18 111:2,3 112:2,7,15, 16 113:3,14</p> <p>haven't 45:1 69:25 75:5</p> <p>having 4:3 12:4,5 42:5 55:13,14 70:8, 12 97:16 98:20</p> <p>he 10:17,18 11:23 12:24,25 13:1,2 14:18 17:2,3,4,9 19:7 20:10 24:11, 23,24 25:7,16,17, 18 26:3 27:1,21,22 28:12 29:25 30:5, 18 31:14,16,24 33:8,10 35:8,22,24 36:2,4,5,7,9,19 50:8,22 51:21 52:9, 10,25 53:2,3,4,6,7, 10,12,13,15,16,17, 19,20 56:14 57:2, 18,20,23,24 58:20, 25 59:1,23,24,25 60:6,7,17 61:24 62:3,5,6,7,9,25 75:19,21 86:23 87:11,15 90:17</p>	<p>92:3,6,9,24 94:10 95:5,13 96:16,17, 24 97:1,2,11 100:24 101:2,3 102:25 103:1,3,19 107:11,12,15 108:6 111:13,15 112:16</p> <p>he'll 24:24 57:5,6</p> <p>he's 4:10 20:3 25:16,25 31:24 35:11 47:21 57:20 79:20 103:4,5</p> <p>head 45:23 66:2 73:7,18</p> <p>hear 82:16 102:24</p> <p>heard 75:5 101:16 106:8</p> <p>heightened 79:12</p> <p>hell 50:8</p> <p>help 13:11 100:6,8, 9,13,17 103:20</p> <p>helped 101:10</p> <p>helpful 46:3,8</p> <p>helping 100:1,11</p> <p>her 36:21 53:5,9, 15,17 58:20 59:2, 23,24,25 60:17,23 69:4 87:6 95:3,5 110:1</p> <p>here 4:10 7:8 18:18 26:14 28:12 33:13 34:18 36:23 71:6 75:15 76:18 84:22 89:9 91:18 102:11 109:14</p> <p>Hey 41:20 61:25 62:12 82:17</p> <p>high 5:16,17,20</p>	<p>20:4 97:3 107:9</p> <p>higher 13:10 20:7</p> <p>Hight 113:17,24</p> <p>highway 106:23</p> <p>Hillsborough 23:12,13</p> <p>him 17:5,8 22:13 24:22 25:15 27:7 29:10,24 30:7,8,14, 23 31:5,9,17,21,25 35:12,13,17 53:5, 16,19 56:21,22,23 57:1,4,7,16,17 63:1 73:7,15 92:12,22 93:5,21,22 95:5 99:1 102:22,24 103:2 104:9 107:11 108:5,8,10</p> <p>himself 92:2 111:15</p> <p>hindsight 76:11,16 77:8,9</p> <p>hire 12:15 13:20,24 16:10,13 17:8 25:19,20 29:1,3,4, 8,10,14,16,20 31:5, 6,17,25 32:15,16 36:19,20,24</p> <p>hired 13:19 17:9 25:17 27:7 30:6,7, 9,11,14,19,23 31:9 32:11 33:6,8,9,11 35:7</p> <p>hiring 11:17,20 12:1 16:13 17:1 31:2 33:23 37:3</p> <p>his 17:6,11,13,14, 17,18,22 19:17 20:1,2,13 24:4,5,7, 8,12,13,22 25:8,16</p>
--	---	--	---

26:3,4,6,8,25 27:3, 16 35:10 49:15 52:10 53:11 59:24 68:25 80:22 90:18 92:8 100:23 108:9 110:1 111:13,15, 16,17 histories 20:10 history 24:10,13,14 hit 73:7 hold 36:4 60:12 71:5 102:15 holding 65:7 home 100:25 107:8,9 homicide 10:5 38:6 honest 46:6 horns 35:4 hospital 48:24 87:7 hour 53:23 hours 102:16 house 53:8,9 100:25 110:25 how 6:20 7:10,18 8:14 9:17 24:15 27:19,21 28:1 29:9 32:9,22 33:12 35:19,24 36:2 39:20 40:24 42:9, 14,16,23 43:2 49:12 51:25 52:7 53:21 58:18,24 60:21,25 61:7 62:22,25 63:2 72:22,23 76:2,4 77:1 80:4,7 82:9,20 94:16,18 97:10,12, 14 99:24 102:7 104:25 105:14	106:14 110:9 112:2,5 however 13:24 15:19 32:5 Huh 76:19 88:4 humerus 69:4 hunt 79:16 hurt 40:25 hurting 109:12 hyperventilate 70:13 <hr/> I <hr/> I'D 32:22 76:10 I'LL 19:19 57:5 78:10 84:22 I'M 4:7 7:10 8:22,23 10:7 11:20 13:13 17:18 22:8,9 23:24 26:20 30:2,25 31:25 32:2 33:3 36:1 37:13 47:10, 22 49:24 50:2 52:19,21 57:4,6,12 59:18 62:4 66:5,12, 23 67:5 70:13 71:4 72:2 80:6 84:14,17 85:18 86:9,11 88:3, 5,20 89:19 97:18 100:7,15 102:11, 12,14,19 105:4,23 106:4,9 109:12,13 110:12 111:20 I'VE 10:1 32:12 33:15 37:5 56:22 57:16 63:1 74:2,7, 16,17,20 98:6,16 105:20,22,24 106:8 108:13	idea 82:11,12 105:16 identification 21:4 46:11 48:14 66:19 84:3 86:14 89:7 90:24 identified 48:12 61:15 identify 18:11 22:5 23:1 45:10 80:8 if 12:24 14:21 17:15 21:14 22:12 24:19 25:16 26:9 30:13, 17,18 32:19 33:24 37:21,22 38:23 39:12,22 40:4,18 41:23 44:7,21 45:5 46:12 47:11 52:22, 23 60:15 63:25 64:4,10,19 66:21, 25 68:2 69:16 70:17,21 81:5 82:12,16 85:19,21 87:7,9,11 91:16 93:15 97:19,20 99:23 105:17,22 108:9,17 109:15 110:24,25 111:4 112:4,14,18,22,24 113:1,10 illustrates 50:5 illustrations 50:10, 15 imagine 52:14,15 87:4 immediately 24:25 112:19 imminent 92:4,9 impair 5:3 impede 40:5	imposed 92:12 93:5,9 in 4:17 5:11,12,15, 18,25 6:4,16,22,25 7:8 8:6,7,8,13,14, 18,21 9:3,5,9,15, 17,20,23 10:2,3,9, 12,15,19,23,24 11:11,14 12:3,4,9 13:13 14:2,8,18,19, 21 15:11,17,20,25 20:10 21:19 22:13 23:2 24:10,22,23 25:6,10,16,25 26:9, 13,14,20 27:5,19 28:22 29:24 31:18 32:2,5,6,9,10,17, 24,25 33:4,7,10 34:14,15,21,25 35:1,16 36:4,5,7,21 37:4,6,8,9,16,19 38:18 39:2,4,23 40:4,12,25 43:1,9 44:8 45:1,14,16 46:22,24 47:14,25 49:22,24 50:22 51:14 52:9 54:17, 18,19,20,21,22 55:1,2,3,5,6,18 57:5 59:21 60:1 62:10 63:23 64:16, 17 65:20,24 66:2,6 67:18,19 68:8,17, 19 69:3,4,10 70:10 71:19 72:19 73:7, 15,18 75:1 76:5,8, 13,22 77:9,19,20, 21 79:5,8,12,16,18, 19,23 80:2,14,21, 22 81:1,8,25 82:2, 10 83:6,13,16,17, 19,20,21 84:5,25 85:12 87:10,12,14 91:13,15,23,25
--	--	---	--

93:9,16 94:13,14, 16 95:7,25 96:1,11 97:11,16,21 98:5, 16,17 99:18,23,24 100:9,20,23 101:13,22 103:1,2, 5,10,12,14,23 104:2,18 106:18 107:25 108:2 110:10,21 111:1,6, 7 112:9,14,22,25 113:1,4,6,12,19	individuals 73:25 ineffective 69:1 information 18:13 23:4 26:21 27:16 28:5,7,22 29:24 30:22 34:17,22 37:16 38:24 42:3, 25 48:8,22,23 informed 92:21 infraction 110:17 initially 6:18 56:15 73:16 94:11 injured 59:11 67:18,21 73:20 79:2 82:5 87:3 95:19 97:8 injuries 87:6 injury 69:16 92:10 inside 108:5 instance 14:19,21 36:7 95:24 instances 39:4,7 74:1,15 75:1 81:8 94:24 106:17 110:21 111:6,9 112:9,11,13 instruction 46:22 instructor 88:6 91:4,12 interact 35:13 interacting 35:16 interaction 102:22 interchangeably 90:7 interference 90:3 intern 6:13	internal 97:19 98:2, 21 99:6,7,18 interstate 106:22 interview 12:8,9,12 26:3 27:17,21 28:14,19 29:13 43:14 interviewed 17:5 30:17 32:4 93:18, 20,23 interviews 27:21 28:4 48:25 intimately 84:14,18 89:20 into 10:25 11:1,3,7, 8,12 76:10 77:3 79:6 90:6 96:23 97:1 100:25 104:21 111:13 introduce 4:9 21:10 intrusive 65:10,14 investigate 43:10 81:3 105:18 investigated 47:14 59:4 95:10 investigation 8:18 15:20 25:22 32:24 38:20 40:19,20 41:9,24,25 42:2 48:8,20 52:12 53:10 55:12 56:6, 21 61:14 72:20,24 75:2 76:9 77:9 92:15 97:17 98:22 99:18 101:2,10 103:15 investigations 7:1 8:8,9,10,11,20 9:4, 5,7 14:20 15:5 37:15 40:13 42:10	50:25 51:3 57:1 61:1 76:8 81:12 98:15,19 99:5,6 100:2,4,10 103:8, 18 investigative 9:6 10:23 investigator 6:22 8:16,17 9:19 25:21 58:13 101:5,18 103:11 investigator's 25:20 investigators 9:13 15:4,22 100:21 involved 9:21 38:18 44:8 70:10 72:19 97:16,20 103:12 110:21 111:1,7 involvement 40:12 is 4:21,23 8:4 9:25 12:13,16 13:23 14:15,16,18 15:1,5 17:19 18:15 19:6 22:23 23:14 25:4, 11 26:22 27:5,8 28:18 29:21 30:21 32:1 33:13 34:2,17 35:15 36:21 38:9 39:5 40:3 42:2 44:2,18 45:13,21 46:1,2 48:6 49:1 50:14,21 51:16,18 54:23 56:14 57:8, 21,22 58:11,14,16 59:11 62:25 64:7 65:10,11,14 66:15 67:7,12,14,15,16 68:15 69:13,17 70:12 71:1,9 73:13 75:15 76:10,17,22
---	---	--	--

77:23 78:20 79:12 80:21 83:5 84:20 89:14,22,24 90:2, 11,21 91:2,10,12, 23 92:1,6 93:7,10 94:10,21 95:7 96:15 97:22 98:11 101:19,20 105:3,12 106:2 108:17,24 109:1,2,5,9,10,12, 22,25 110:5,15,16, 17,20,23,25 111:1, 18 112:6 113:15 isn't 50:14 67:17 94:6 issuance 46:20 issue 68:1 issues 47:7 it 6:5 7:16,17,18 9:15,21 10:21,24, 25 11:1,3,7,8,11 12:4 13:4,5,24 15:13 16:21 17:1,3, 15,16,22,24 18:16, 20,22 19:6,11,19 20:15,17,18 21:22, 24 22:4,10,17 27:8, 11,14,15,23,25 28:8,23 29:4,6 30:13 31:23 32:6, 21 33:2 34:15,19, 21,25 35:4,5,21,22 36:6,22 37:5 38:4, 14,17,23 40:7,18 41:16,23 42:4,5,6, 11 44:3,4,20,21,25 45:1,5,16 46:3,8 47:11 49:9,10 50:1, 4,7,9 51:6,12,13 53:1,3,10,23 54:5, 11,13 55:12,21 56:22,23 57:2,6,9, 17,22 58:11 59:9, 12,15,17 61:18,19 62:6,7,8,9,10,15, 20,25 63:14,15,16, 25 64:5,7,11 65:21 66:5,14 67:11,17 68:16,18,19,21,25 69:3,8,14,16 70:13 71:1 72:6 73:17,23 75:6,15 76:12,13 77:1,10 81:10,11, 23,24,25 82:3,5,13, 16,17 83:3 84:14, 15,16,17,18,21 85:18 86:25 87:5 89:2,19,20,21 91:4, 5,16,20 92:1 97:12, 14 98:3,5,7 99:22, 24 100:1,24 101:3, 8 102:4,6,7,19 103:3,6,23,24,25 104:1,2,4,8,17 106:2 107:16,18 108:9,20 109:7,11 110:14,15,18,20,24 112:21,23 113:17, 24 it's 13:9 15:2,3 18:12 22:8 26:23 28:22 32:19 38:10, 21 39:22 45:21 48:7 50:22 51:16, 20 57:2 63:25 64:4 66:25 73:17 75:18, 23 78:21 82:18 89:5 91:18 100:19 102:8,18 104:14 106:3 110:10 111:4 items 11:8 its 46:22 <hr/> J <hr/> J.J. 61:25	jail 108:14 Jersey 5:15 6:12 job 8:25 13:20 40:3 105:6,8 jobs 14:12 judge 85:8 jump 96:25 just 4:8 13:11,13 15:3 17:2,24 18:2 21:10 22:13 23:5,9 24:19 27:14,22,23 28:8,22 29:22 30:2 32:17,23 35:3 38:22 39:17 41:18, 20 44:18 47:11,22 49:16 52:22 55:6, 12 57:2 59:15,17 63:17 64:4,10 65:7 66:13,21 68:5 72:6 78:15 80:11,16 84:8 87:5 92:24 99:25 101:19 102:1 103:3 104:15,24 105:2 107:13 109:14,19,20 110:15 113:9,15 justice 6:1 justification 93:10 justified 91:23 Justin 58:13 <hr/> K <hr/> keep 18:2,3 19:12 65:20 66:2 83:12 kept 61:8 kick 67:11 kicked 108:3	kicking 108:6,10 killed 31:24 95:23 112:20 Kimberly 36:13 kind 13:22 14:12,25 25:10 35:21 38:25 41:14 47:11 55:12 60:12 63:17 80:18 82:20 87:21 107:5 knew 41:16 know 4:15 7:18 8:12,18 9:20 11:19, 22 12:11,21,24 13:1,14,22,23,24 17:4,15 18:2 21:15 22:10,13 24:24 25:18,25 26:13 27:25 28:19,22 30:4,5 32:2 34:15, 24,25 35:14,15 37:2,21,22 38:3,23 39:20,21 40:1,3,24 41:15,20,21 42:16, 19 43:7,11,21 44:11 46:5,9 49:6, 10,23 52:4,5,10,16, 17,21,23 53:1,2,25 54:8,9,19 56:5,8,22 57:2,4,5,16,21,24, 25 60:15 61:6,11, 20,24,25 62:4,5,7, 13 63:2,14 66:4,5 67:9 68:2 70:8,10, 19,20,21,22 72:16 74:9 75:15,22 76:1, 14 78:11 79:23 80:9,20,21 82:12, 21 83:2,3,5,7,9,16, 20 84:14,15,17,18 86:6 87:5,6,7,8,9, 11 89:22 94:18 96:4,21 97:14 98:10,16 99:22,23,
---	---	---

<p>24 100:9 102:15 103:5,13,24,25 104:18,23 105:13, 19,20 106:2,4,9 108:9,19,20 109:3, 10 110:9,23 112:4 113:10</p> <p>knowing 32:14</p> <p>knowledge 55:13 70:23 78:16 80:10 104:23 105:10</p> <p>known 80:12</p> <p>knows 57:2</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>laboratory 85:15</p> <p>lady 36:12,17 59:1 80:24 86:24,25 95:1</p> <p>lake 96:23</p> <p>last 18:6 19:14 23:22 29:12,23 42:15 53:21 68:21 96:14,19 107:11</p> <p>later 62:7</p> <p>lateral 14:25</p> <p>Latwanya 48:10</p> <p>law 7:7,9 13:13,14 14:1 27:2,3 60:2 65:19,22 91:16,20, 23 112:3,10,12,16, 17</p> <p>Lawrence 61:19</p> <p>lawyer 10:20</p> <p>leadership 67:21</p> <p>learned 66:4</p>	<p>least 7:16 94:23</p> <p>leave 47:11 57:8</p> <p>leaving 18:23 19:1 107:20</p> <p>left 32:21 69:4 76:7</p> <p>leg 60:7</p> <p>legal 75:14 108:20</p> <p>length 62:16</p> <p>less 6:15 42:21 65:10,14,15 93:8</p> <p>let 18:2 21:15 22:13 41:15 48:11 53:16 56:21,22 57:1,4 72:9 78:9 101:19</p> <p>let's 11:16 19:3,9 21:1 22:4 26:2 28:11 50:1 51:22, 24 58:7,9 59:7,9 68:5,14 69:5 71:3,8 73:9 84:9 86:3,13 87:17,18 91:6,7,15 92:14 93:14,15 101:20</p> <p>lethal 65:10</p> <p>letter 33:18</p> <p>letterhead 33:18</p> <p>letting 57:16</p> <p>level 13:17 14:3 15:15 41:23 81:24</p> <p>license 27:1</p> <p>lieutenant 8:21,24 9:1 12:20,21,23,25 13:2,15,16 15:20 49:20 54:6 55:16, 18 58:12 83:17</p> <p>lieutenants 13:9,10 15:16,18</p>	<p>life 37:19</p> <p>like 4:21 7:25 10:21 11:13 13:23 14:7 15:3 16:24 17:2,22 22:10 23:6 24:14 25:7,20 26:25 27:23 28:17 33:24 35:5 37:13,18 39:22 43:3 44:6,7, 21 45:12 50:7 54:9 59:10 61:10 63:21 66:5 76:10 79:13 81:19 85:3 87:21 93:9 96:23 97:21 100:21 101:12 105:3,12 107:8,16 108:5 109:11 113:14</p> <p>likelihood 109:23 110:1</p> <p>line 15:7 27:19 45:12 103:1</p> <p>listed 50:6,19</p> <p>listened 48:24 52:11</p> <p>little 6:25 7:21 11:16 12:10 19:4 24:15 37:2 42:20, 22 52:22 66:3 69:5 75:22 76:10 98:12 104:14 107:5</p> <p>live 28:21 62:7</p> <p>lived 20:4,10 24:11 100:24</p> <p>locked 107:12</p> <p>long 6:20 7:10,18 8:14 9:17 14:12 22:10 35:24 36:2 42:9,14,16,23 43:2 45:1 53:21 76:4</p>	<p>97:12,14 99:24 102:7</p> <p>longer 7:18 42:20 44:5 58:15 73:15, 17 76:2 102:7 111:16</p> <p>look 15:1 17:21 22:10 38:4 39:3 40:15 45:5,14 65:20</p> <p>looked 17:12,19 21:8 45:1 104:21 107:12</p> <p>looking 65:18 71:4 76:22 95:25</p> <p>looks 17:22 66:5 97:21</p> <p>loose 50:8</p> <p>lose 10:10,11</p> <p>loss 70:13</p> <p>lost 10:12 63:12 65:25</p> <p>lot 32:14,15,18 39:14 42:21 104:14 106:9,10</p> <p>Louisburg 18:25</p> <p>lower 13:17</p> <p>lowering 95:4</p> <p>lowest 14:3</p> <p>lunch 67:1 76:3 107:20</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>ma'am 4:14 11:15 18:21 19:8,24 22:22,25 31:11 46:18 48:4 65:17</p>
---	--	--	---

74:16 75:9 80:9 82:7 83:1 84:7 85:18,21 86:18 87:2,15,23 88:1,8 89:13,16,19,21 90:13,22 91:2,12 93:1,4,20 94:7,18 95:11,18 97:7 100:5 101:25 102:5,25 104:6,13 105:9,19 106:13,18 109:10 111:23 112:11,21 113:6,7, 21,23 mace 47:6 59:24 63:21 68:25 69:18, 19,23 108:8 made 11:3,7 17:8 29:2,6,13 62:14 63:18 77:16 82:5 101:1 103:19 111:6 major 5:25 majority 61:4 make 11:8 12:14 16:10,13 17:19 35:19,21 41:16 43:19,22,23 51:15 53:9,11 54:11 56:7 60:21 101:19 108:23 111:22 makes 69:16 making 32:23 mandate 75:12 maneuver 53:18,19 69:3,7,9,13 manner 62:10 Manual 45:9 many 12:10 27:21 28:1 31:15 32:6,9, 22 60:25 61:2,7	62:22,25 63:2 72:22,23 82:9 94:16,19 104:25 105:14 106:14 March 5:9 mark 20:22 21:1,11 46:4,6,8 86:13 89:2,3 marked 20:24 21:4 46:1,11 48:13,14 66:19 68:14 84:3 86:14 89:7,12 90:24 92:14 marking 66:17 Martin 23:11 master's 6:4 matter 33:1 may 12:3 13:18,21, 25 14:9,13,20,24, 25 15:7,8,9,12 24:12,18 25:4 26:19 41:16,18,19 42:5 49:14 79:16 98:7 maybe 12:10,20 27:24 30:15 76:23 101:9 Mcgurl 4:10 me 4:21 5:10,19 6:8 13:7,11 17:4 18:23 21:15 29:9 31:12 32:3,17 34:16,17 35:21 37:10,18 40:12,18 41:1,3 43:4 44:19 48:19 52:2,9 53:20 54:9, 12,21,22 55:11,12 56:4 58:18 60:4,9 61:25 62:25 63:16 71:7,21 72:6,9,22	73:2,4 74:1,8,24 77:1,7 78:9 79:4 81:4,10,11 82:3,17 84:23 86:19 88:16, 22 89:25 91:18 96:18 101:6,7,19 102:21 103:1,10, 19,22 104:17 105:2 106:4,5,6,8,20 107:24 108:11 109:13 111:9 mean 8:23 9:12 13:16 32:21 37:11 38:14,15 43:8 47:4, 5 50:23 54:21 74:4, 6 81:25 82:15 86:25 88:15,16,17 99:4,6 101:7 103:24 104:1 106:1 110:18 means 38:17 92:7,8 measure 65:15 medications 5:2 meet 62:14 meeting 43:11 54:13 member 109:3,4 memory 42:17,23 43:2 44:25 61:6 63:13 65:20 80:21, 22 93:15,16 94:2,6, 12 104:18 106:19 mental 7:25 mentioned 7:19 40:10,11 49:17 97:18 113:25 mercy 26:20 Merrimack 23:11 met 63:1 79:6	methods 67:18 Michael 4:10 18:17 20:21 21:25 45:2 47:16 66:22 71:4 78:3 84:1 86:9 87:17 90:16 91:8 might 7:17 12:25 13:1,2 16:16 20:8,9 24:12,14,24 25:1,7 28:7,14,19 38:5 52:16,21 54:5 76:13 89:9 102:15 103:23,24 mind 9:8 24:17 36:21 46:19 67:22 68:20 70:11 77:9 81:1 94:22 96:14 111:19,21 minimum 7:17 27:22 28:2,9,11,20 101:9 minute 47:19 86:12 107:11 minutes 21:8 107:7 misdemeanor 79:14 misplace 10:10,11 misplaced 10:12 mobile 107:8,9 moment 45:5 84:8 money 10:18 months 7:17 more 14:10 16:24 19:4 23:24 24:20 28:15 35:16 37:2 39:14 57:13 68:5 84:10 93:7 101:5,7, 18 103:11
--	---	--	--

morning 4:7 77:19, 20 mornings 39:2 most 64:16 98:4 100:3,5,19 103:9 move 22:11 40:7 moving 28:25 69:2 Mr 4:7,18,19,23,24 16:25 17:1 18:6,15 19:6,22 20:7,24 21:2,6,7,16,21,22 22:6,12 24:3,20 26:9,13,24 27:18, 20 28:1,25 29:16, 20 30:10,18 31:1,7 32:4 35:6,8 36:10, 11,14 37:4,18,20, 23 45:14 46:1,3,8, 12 47:14,24 48:2 49:15,19 50:6,18, 21 51:1,3,6,9,19,24 54:1,20,22,24 55:5, 9,18 56:11,14 59:22 60:16,20,23 61:18,20 63:1 66:14,15,25 67:2,4 76:7,16,18,20 77:4, 8 86:5 87:18,21 89:1,3,4,5,11 90:10 92:18,21 101:14,24 102:20 109:15 113:14 Ms 4:6 18:17,19 19:3,5,12,13 20:21 21:1,5,12,18,20,25 22:2,4,7 36:25 37:24 45:2,4 46:2, 5,10,15 47:16,18, 21 48:1,11,15,23 49:1,3,21 55:15 56:15 60:20,23 66:17,20,22 67:3,6	71:3,10 76:6,19,21 78:3,5 84:4,9,12 86:3,8,16 87:17,20 89:1,4,8 90:9,16, 20,23,25 91:8,9 92:16,21 94:11 101:15,17,23 113:8,13 much 76:2 102:7, 22,24 112:2,5 multiple 74:6 multiple-officer 67:15 murder 39:8 96:1,3, 7,8 112:22,23 murdered 112:14 113:1 must 85:7,14 109:3,9 my 4:9 6:4,21 7:13 9:5,6 21:8 33:13 35:3,11,23 36:9,21 38:2 41:19 44:18 48:7,8 52:9 54:18 55:2,5,6,18 56:6 57:3 63:13 65:19 66:2 73:16,23 74:20 77:9,10 80:21,22 81:1 84:20 88:13 94:12 98:16,17,25 100:10 103:1,4 104:18,23, 24 106:6,18 107:3, 10,17 109:12 110:5 113:15 myself 4:9 12:20 <hr/> N <hr/> name 5:5,19 36:7 39:15 45:7	named 36:12 names 13:3 naming 66:5 nature 16:11 104:12 NCGS 4:2 NCIC 26:16 necessarily 27:11 40:23 64:20 76:24 82:14,15 92:2 necessary 27:10 40:18 need 17:25 21:14 22:6 26:21 28:7 46:13 89:9 109:14 needed 44:5 58:15 109:20 111:16 neighboring 96:2 never 10:11,24,25 11:3,6,7,8 69:22 81:25 83:25 93:20, 23 105:22,24 new 5:15 6:12 13:24 23:12,13 Newark 6:12 next 8:7 14:15 19:3 24:22 26:9 41:22 49:12 53:13 68:20, 21 night 38:6 53:13 no 4:17,20 7:16 10:1,11 20:19 26:6 27:11 28:22,23 30:8 31:3 32:8,13, 22 33:21 35:3,11 40:23 42:11 43:13 44:5,18 45:13 50:9 54:3,17 56:4 58:14	59:19 62:20 64:6 69:15 71:21 72:2 73:15,17,21,23 76:3 77:5,6,10 81:10,14,16 82:11, 12 83:1,25 85:21 86:9 87:23,24 88:1, 3,5,8,25 93:1,20 94:3,7 95:21,23 96:5 102:5,20,25 103:23 104:13 105:16,19 108:24 109:1,2,10,17 111:16 112:10,12, 21,24 nodded 23:23 45:23 nominal 103:3 None 94:4,5 nonsupervisory 15:3 nonsuspect 80:18 nonsuspects 80:16 nonviolent 93:10 north 5:11,12,18,24 6:7 20:8,11 23:11, 16,17,18,19,20,21 106:22 not 4:7 7:10 8:22, 23 12:15 13:13,19 14:14 15:2,12 16:1, 16 21:22,23 24:24 25:1 26:19 27:11, 22 28:1,7 29:14,17, 18,23 30:8,23,24 31:3,5,6,17 32:11, 14 33:6,20,21 35:6, 11,20 36:7 38:5 39:22 40:3,23 42:25 51:16,18,20 53:10 54:18,19
---	---	---	---

58:5 60:3,16 61:8 62:4 64:20,21 69:14,23 70:13 71:4,12,25 72:2 77:6,11 81:7,10,15 82:14,15 84:14,17 85:18,21 86:9 87:8 88:1,3,5 89:20 90:3 93:10 96:7 100:14, 16 107:10 111:20 112:6 note 101:19 noted 10:17,18 51:16,18 notes 52:13,15,18, 20 nothing 13:14 76:20 78:11 106:5 now 9:8 24:17,20 44:25 47:13 67:23 68:10,13 70:11 73:17 75:16 76:3, 18 84:21 89:24 90:11 94:22 101:12 102:15 110:12 111:20,21 number 15:19 20:22,25 21:2 32:12,17,21 38:11, 24 43:5 46:2,12 66:16,18 68:15 71:1,2,9 74:16 86:13 104:10,25 105:11,20 109:8 112:5 numbers 38:22 <hr/> O <hr/> obeying 107:10 object 101:15	Objection 37:23 obligations 9:9 obtained 48:22,23 85:6,12 obtaining 24:3 85:14 OC 46:21,24 occasion 100:18 occasions 74:2 98:5 108:13 occurred 49:12 52:8,25 73:3 75:7 86:21 106:24 of 4:17 5:2,14,19 6:12 7:5,10,13,17 8:2,10,12,19,20,22, 23 9:9,13,16 10:16 11:6 12:1,23 13:3, 12,22 14:2,3,6,8, 12,13 15:1,15,16, 19 16:9,10,15,17 17:7 20:3,5,8,11,14 22:4,17 23:3,5 25:6,10,13,23 26:15,20,21,25 27:7,10,12,13,14, 21,22 28:2,6,9,10, 11,20 30:20,21 32:5,14,20,22 33:1, 4,23 34:8 35:1,2, 16,21 37:3,4,9,17, 19 38:7,25 39:11, 18,21,24,25 40:3,6, 11,17 41:14,23 42:1,8,16,17,23 43:2,5 44:9,10 45:8,16,18,25 46:13,20,23,24,25 47:3,11,14 48:7,9 49:7 50:2,4,15,23 51:20 52:10 54:11,	16 55:9,12,13 56:6, 8,25 57:3 58:11 59:7 60:4,12 61:4,7 62:7,15,16 63:13, 17,23 65:4,5,15,25 66:14 67:18 68:17 69:4,21,23 70:8,10, 11,13,14,23 71:11, 16 72:19,23 73:5, 23 74:8,10,11,19, 25 75:2,11 76:4,9, 11,13,14 77:4,7,20, 23,24 78:12,15 79:5 80:1,10,12,13, 18 81:1,9,12,24 82:18,20,25 83:7,9, 13,18,19,22 84:6, 21,25 85:7,8,25 86:19,22 87:5,6,21 88:13,19,21,24 89:14,23 91:14,15, 25 92:4,6,7,9,11,12 93:4,5,13 94:1 95:9 96:3,12,16 97:2,4, 15,21 98:4,5,16,22 99:8,9 100:2,10,11, 21,23 101:9 102:11 103:1,9 104:10,12 105:4,10,11,12,13, 20 107:1,5,10,24 108:3,4,6,10,21 109:3,4,8,11,25 110:2,11,19 111:6, 12,15,18 112:14 113:1 off 11:6 53:6 67:11 74:8 76:7 79:16 101:20,21 102:1 107:13,23 113:10 off-the-record 90:8 offer 13:20 office 6:17 8:5 9:14 11:2,18 13:12	25:11 26:15 32:21 41:19 45:9 47:7 52:9 53:7 54:18,20, 21,22 55:2,6,18 58:14 66:8,11 71:25 72:10 75:8, 10 78:6 85:10,12 87:14 88:17,19,23, 25 103:2,3,4 105:15,22,25 106:1 office's 34:3 officer 6:9 13:25 17:14 27:2 28:11, 15 41:14 42:5,7 43:16,17 44:7 58:13 64:19 67:25 68:8,12 75:13,17 81:1,22 83:5,18 86:22 87:9,13 91:16,21,23 98:8 100:22 101:10 103:12 104:6 107:21 108:2,8 109:9 111:11,12 112:2,5,6,7,9,12, 15,18,23 113:1,2 officer's 104:20 officer-involved 97:22 100:12 officers 10:17 32:10 38:10 41:4 42:19,21 60:2 75:11,19 94:16 96:16 98:6,9 100:11 103:20 108:4,6,7,11,12 offices 9:13 officially 14:14 often 80:22 oh 36:12,16 44:15 45:15,16 76:20
--	---	--	---

86:11 94:18,21 102:10 105:16 106:3,6,18 okay 4:8,15,25 5:5, 10,12,25 6:6,8,18 7:2,5,14,19 8:4,9, 14 9:9,17,22 10:4,7 11:13,16,21,24 16:24 17:18 18:2,3, 4,5,7,10,15,17 19:9 20:20 21:13 22:15, 16,17,18,19 23:16 26:2,8 27:8,20 28:25 29:9,15 30:2, 13 31:4,12 33:17, 22 34:5,7 35:6,19, 24 36:6,16 37:1 38:9 39:16,18 40:8, 10 41:4,11,22 42:13 43:19 44:20 45:6,7,10,18 46:3, 14 47:3,10,15,24 48:5,11,19 49:4,11 50:13,18,25 51:22 52:7 54:23 55:24 56:17 57:10,12,23 58:16,18 59:3,13, 21 60:4,15 61:13 63:3,6,10,16 64:9, 13,21 65:9,22 66:7, 12,14,25 67:3,5,7 68:5,19 69:5,12,16 70:5,17,24 72:5,9, 14,18 73:9 74:21, 25 77:3,6,12,19 78:2,9,13,14,17 79:9 80:4 81:5 83:12,22 84:1,11, 13,20,24 85:2 86:15 87:16 88:9 90:14,19 91:6,15 92:14,17 93:12,14, 25 94:13,21 95:14, 24 96:9 97:24	99:12,20 100:14 102:11,13,14,18,19 103:7 104:10 105:2,5 106:21 108:15,22 109:18, 21 113:24 old 80:25 Oleoresin 46:20 Oliver 48:10,23 49:1,3,21 55:15 56:15 60:20,23 68:24 69:1 92:21 94:11 Oliver's 92:16 on 6:4 7:13 9:14 10:1,17 12:7 14:5, 18,19 15:7,19,22 18:13 19:14 22:23 24:15,21 25:5 27:14,25 28:25 29:6,23 32:21,25 33:18 34:16,18 35:12,13,17 36:4 37:2 38:5,19,21 39:1 40:15,17,24 41:15,18 42:11,18 44:16,18 45:25 46:12 47:23 48:8 49:7 50:5,15 51:6, 10,12,14,16 52:5, 12 53:3,14,15,17 55:5 56:8 58:21 60:3,13,17 61:5 63:23 64:11 65:5 67:11 68:2 71:5,16 73:7,25 74:17,20, 23 75:11,19 77:10, 13,14 78:10 79:15, 22,25 84:22 85:24 87:13 90:10,11 91:3,18 93:9 96:7 98:5,6,17 100:19 101:2 103:25	104:16,17,21,25 106:5,22 107:2,3, 21 108:21,25 110:5,19 112:5,21 on-the-job 99:1 once 7:12 8:19 11:11 12:13 14:4 17:7,9 25:16 29:21 35:11,14 54:25 55:21 67:1 83:17 one 10:16 11:11 12:10,23 16:9 17:4, 6,12,13,16 27:22, 23 28:2,9,11,14,20 32:9 33:4 37:3 56:15 67:14,15,16 68:1 73:5 74:19 78:21 86:22 94:10 95:5,14 96:14,16, 19 97:2 99:17,19 101:4,5,8,18 103:9, 11 106:8 107:1,14 108:1 111:18,19,20 ones 14:5 104:24 ongoing 26:22 online 12:3 only 47:6 63:6,8 80:18 92:1 94:9 98:16 99:17 108:17 111:18,19,20 opened 10:20 opening 25:20 operate 43:9 operating 57:3 operation 38:21 opinion 12:15 59:21 opportunity 48:2	options 68:22,23 or 4:12,17 6:9 7:15 8:22 9:13,20 10:10, 11,12 12:3,15,20, 25 13:10,16,23,24 15:2,12 16:14 17:3 20:4,10 21:9,22,23 23:3 26:4,19 27:23 29:5,11,14,23 30:23,24 32:5,10 34:14 35:2,13 40:13 42:5 43:1 44:13 46:25 47:4 51:6,13,23 52:23 53:8,12,13 54:5,13, 18,19 55:6,25 59:8, 25 60:1 61:5 64:17 65:2 68:7 69:10,19 77:13,23 79:14 80:7,25 82:16 85:13 92:1,2,5,7,8, 9,11 93:8 95:19 97:20 98:3 99:24 101:1 103:15 104:11,12 105:25 106:1,8,15 107:7 108:10,11 110:1 111:9 oranges 110:10 order 49:22 51:14 66:6 83:6 85:7,9 other 24:4 25:6 33:7 46:24 61:14 63:21 68:1,22,23 70:12 87:10,12 92:8 93:16 95:24 98:6,19 100:11 103:2,20 106:15,16 107:13 108:12 others 24:18 92:10 our 12:14,15 23:3 29:21 62:14 69:10
---	---	--	--

<p>96:2</p> <p>out 6:12 8:19,20 10:23 14:4 17:2 23:3,7 24:2 27:15 36:20,21 38:5,25 39:24,25 40:6 42:5 47:11 53:6 57:21 61:24 62:7 63:13 74:10,11 79:13,17 86:22,24 90:6 95:2 96:12 97:2 102:11 107:2,6,13 108:3,4, 10 111:12</p> <p>outcome 57:19 95:9,12</p> <p>outcomes 108:18</p> <p>outside 20:8,11 55:9 78:12 104:23</p> <p>over 9:2,3,11 10:8 11:3 12:19,25 13:6 14:8 15:11 16:9 22:10 24:10 34:19, 20 38:3,7,8 40:7 45:5 56:23 63:12 66:4 70:15 74:13 83:15,20 89:9 96:16 98:20 107:5</p> <p>Owl 5:11</p> <p>own 7:13 35:3 97:19 113:15</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 76:5 101:22 113:12</p> <p>page 18:6 19:14 22:4 45:25 50:1,4,9 66:14,21,22 67:11 85:1</p> <p>pages 84:25</p>	<p>panel 12:12,16,17 17:5 26:3,4,7 27:8, 9,17,20 28:3,14 29:12,21,25 30:7,8, 10,13,17,20,21 31:1,4 36:19 43:10, 13 100:21</p> <p>panels 32:25 37:3</p> <p>panic 70:15</p> <p>papers 8:2,3 14:6 37:15</p> <p>paperwork 35:15</p> <p>part 20:14 33:23 40:3 56:6 57:3 73:23 100:3,5,10, 19 109:3</p> <p>partially 106:25</p> <p>participating 4:11</p> <p>particular 13:15 24:16 25:17 28:15, 24 32:9 33:13 36:15 37:5 38:11, 12 42:4,8 44:6 83:16,21 96:7 103:19</p> <p>Pasquotank 23:19</p> <p>passing 103:3</p> <p>patients 7:25</p> <p>patrol 6:23 7:21 8:6 14:19 15:17,23 17:10 100:22</p> <p>patrolman 106:23</p> <p>pay 15:1 44:4</p> <p>payroll 87:14</p> <p>pen 46:13</p> <p>people 12:22 13:7 16:9 24:14 25:9,13,</p>	<p>19 28:16,20 42:20, 21 60:3 61:9,10 73:4 74:3,5,17,20 79:20,23 82:4 83:15 86:19 93:8 101:9 105:14,21 106:2,3 108:14</p> <p>people's 24:10</p> <p>pepper 63:21 64:24 65:11,16 69:19,21 70:7,9 73:25 74:3</p> <p>pepper-sprayed 73:4</p> <p>per 109:11</p> <p>perfectly 21:9</p> <p>perform 28:3 60:16</p> <p>performed 13:7 24:21 53:17,20</p> <p>period 5:14 14:4 25:5</p> <p>permits 37:14</p> <p>Perquimans 23:20</p> <p>person 9:15 13:18, 20,21,25 34:18 36:15 42:6 54:1,4 60:11 68:2 91:24 92:3,6,11 93:5 95:4,16 97:8 103:10 105:3 106:6 107:7,21,24 108:11 112:14</p> <p>person's 40:16 41:12</p> <p>personal 35:3 70:23 88:23</p> <p>personally 83:24, 25</p> <p>personnel 89:6</p>	<p>persons 61:14 63:6,8</p> <p>pertaining 48:9</p> <p>phase 7:10,12 25:10</p> <p>phone 54:13 55:6</p> <p>phrased 72:6</p> <p>physical 91:24 92:4,10</p> <p>pick 82:16</p> <p>Pitt 23:20</p> <p>place 28:13 43:1 65:4 80:25 81:2</p> <p>placed 112:19</p> <p>places 20:10</p> <p>placing 65:2</p> <p>Plaintiff 4:18</p> <p>played 77:10</p> <p>plays 113:4</p> <p>please 21:15 37:25 47:20 58:8,9 85:1 90:14,16</p> <p>pleasure 110:2,11</p> <p>point 11:2 13:1 24:24 25:2,3,24 26:1 27:5 35:25 36:3 49:24 52:10 54:17 55:1,2,3 85:4</p> <p>pointed 57:21</p> <p>pointing 95:5</p> <p>poked 103:5</p> <p>police 6:9 28:17 36:18</p> <p>policies 72:15,16 76:14</p>
--	--	--	--

<p>policy 35:1,2 44:24 45:3,8,9,11,19,22, 25 47:2,11 58:22, 25 59:14,20 66:13 67:7,8,9 69:3,7,10, 13,17 70:25 71:8 84:5,8,13 89:18 91:10 92:24 97:24</p> <p>poor 25:1</p> <p>portfolio 36:22</p> <p>portion 90:2,3,4,5 91:13</p> <p>position 6:18 8:15 9:6,18,23 10:9 15:25 16:6</p> <p>positions 31:15</p> <p>possible 78:11</p> <p>posted 82:7</p> <p>potential 18:13</p> <p>practice 54:10 81:25 97:25 98:1 109:6,7</p> <p>pre-employment 12:6</p> <p>prepared 5:1 85:8</p> <p>presence 55:5,9 63:19 64:23</p> <p>present 54:21</p> <p>presents 92:9</p> <p>president 31:24</p> <p>presiding 85:8</p> <p>pretend 13:13</p> <p>pretty 20:15 74:21</p> <p>prevent 92:5,11 93:4</p> <p>previous 31:15</p>	<p>previously 27:2</p> <p>primarily 9:25 13:9, 10 14:5</p> <p>prior 46:20 68:24 85:13</p> <p>prison 93:9</p> <p>probably 6:15 14:2 37:3 39:14 77:19 81:20</p> <p>problem 88:9,13, 21,25</p> <p>procedure 57:3</p> <p>procedures 72:15, 17</p> <p>proceedings 21:19 47:25 76:5 101:22 113:12</p> <p>process 11:17,20 12:1,13 17:1 24:22 27:7 29:10 33:4,5, 12,23 34:6,7,8 41:11 44:10 48:19 79:5 97:21</p> <p>processed 49:13</p> <p>produce 51:15</p> <p>progressively 44:14</p> <p>promoted 7:1 8:6, 8,11,21 13:1 14:14, 21</p> <p>promotion 6:21 14:23 15:2</p> <p>proof 47:8</p> <p>prospects 24:8</p> <p>provide 26:24</p> <p>provided 77:16 103:15</p>	<p>public 10:23</p> <p>pull 17:18 20:5,21 21:25 58:8 66:12 70:24 71:8 86:3 87:17,18 89:1,10</p> <p>pulled 45:3 84:1</p> <p>pulling 107:8</p> <p>purpose 30:20,21 80:2 91:25</p> <p>purposes 4:17 23:5 80:3</p> <p>Pursuant 4:2</p> <p>push 74:8</p> <p>put 22:17 27:15 31:18 32:21 46:12 53:15 60:13 64:11 74:16,18,20,23 81:25 107:2,3 108:2 112:4</p> <p>putting 33:10</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualification 91:14</p> <p>qualified 25:23 88:18</p> <p>qualify 25:8</p> <p>quantitative 112:4</p> <p>quarter 67:16</p> <p>question 19:10 30:16 37:25 38:1 39:20,22 50:13,14 51:4 65:12 68:6 72:3,9 77:12 80:11 84:20 102:16 108:17 109:24 110:3,9</p>	<p>questions 4:17 18:8 23:25 24:5,9 50:3 78:4 84:22 102:4 113:15</p> <p>quick 66:23 67:13</p> <p>quite 8:22,23</p> <p>quote 51:20 63:13, 16 76:15</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raids 79:22,24</p> <p>ran 26:4,6,8 27:16 53:4</p> <p>range 90:6,7 104:3 110:18,19</p> <p>rank 13:3</p> <p>ranks 13:18</p> <p>rape 39:10</p> <p>rare 100:18</p> <p>rate 97:4 107:9</p> <p>reach 23:3</p> <p>reached 23:7 58:19</p> <p>reaching 24:2</p> <p>reaction 70:6,9</p> <p>read 18:23,25 19:14 22:6 23:9 45:7,12 58:7,9 85:3 90:14 91:6,7,15,20 92:24 93:2</p> <p>reading 46:19 68:20</p> <p>reads 57:22</p> <p>ready 25:15 67:4,5</p> <p>realized 53:7</p>
--	--	--	---

<p>really 27:24 36:22 102:14</p> <p>reason 18:22 19:1 28:23 31:16 36:20 96:21 111:12</p> <p>reasonably 92:1,3, 6</p> <p>reasons 28:8,21</p> <p>recall 24:19 26:10, 11,12 27:20 28:1 34:9 35:8,9,18 48:16 49:4,18,19 53:22 55:7,10,11 56:20 57:14,15,16, 17 62:16,19,20 67:24 68:7,10,13 71:14,17,18 77:22 79:22 80:13 81:5 94:22 97:13 99:20 100:20 104:10 106:17</p> <p>receive 46:21</p> <p>received 10:25 11:1 27:10</p> <p>recently 16:5</p> <p>recess 21:19 47:25 76:5 101:22 113:12</p> <p>recognize 22:20 63:14,15 91:1</p> <p>recommend 29:10 30:8,10,14,23 31:1 59:8,12,13</p> <p>recommendation 29:2,3,6,13,15,22 31:13,18 35:20,23 36:8,9 43:20,22,23 44:1,13,15,18 51:15 55:23 57:6,8, 21,22 58:8,10,11, 19 77:11 110:4,5</p>	<p>111:22</p> <p>recommendations 12:14 16:14,16,17, 22 29:21</p> <p>recommended 29:1,4,7,16,20 30:7,18 31:5,6,17 32:10,11,14,15 35:7 36:18,19 58:3 67:25 68:8,11</p> <p>record 5:6 20:2,13 23:5 24:3,4 38:12, 13 48:11 76:4 78:10 87:19 89:6, 14 101:20,21 102:2 113:11</p> <p>recordings 48:25</p> <p>records 9:2 20:5 37:13,14 83:12,18, 19</p> <p>recruited 6:11</p> <p>refer 4:18,22 14:9</p> <p>referred 86:18</p> <p>referring 33:24 50:7 56:1 67:12 86:7 96:19</p> <p>refill 47:22</p> <p>reflect 48:11</p> <p>refused 74:10</p> <p>registration 53:4</p> <p>release 79:19</p> <p>released 79:7</p> <p>Relevance 37:23</p> <p>relevant 43:17</p> <p>relied 77:13,14</p> <p>rely 98:6</p>	<p>remain 87:13</p> <p>remember 10:16,22 11:5 12:18,24 17:22 24:9 32:7,8 52:17,23,24 54:8, 12,14,15 55:13,14, 15,16,17,19,21,24 56:4,5,13,14,16 58:1 80:23 94:10 99:17,19,25 104:5 112:1</p> <p>remotely 4:3</p> <p>repeat 4:8 86:1 88:20</p> <p>report 16:3 38:9,16, 18,24 39:5,9,10,11, 12,13,19 40:1,9,10 41:4,8,9,10 43:6 44:8,9 47:17 48:21, 22 50:2,4,23,24 51:7,15 52:3 54:9 55:14,20,22 57:11 64:5,8,12,16,18 68:15,17 70:2 73:23 75:4 77:25 110:20,24 111:2,4, 5 113:17</p> <p>reported 47:1</p> <p>reporter 4:16 90:4, 8</p> <p>reporting 73:24</p> <p>reports 38:3,7,8,10, 19,20,21 39:2 40:14,21 49:22 51:7 77:13,21</p> <p>reprimanded 87:9, 12</p> <p>request 20:3,9 26:15 34:20 100:6, 8,13,17</p>	<p>requester 34:21</p> <p>requesting 33:22</p> <p>requests 23:4</p> <p>require 60:18</p> <p>required 38:18 39:5 41:4 47:1</p> <p>requirement 89:23 110:20,24</p> <p>resided 5:12</p> <p>resist 74:4</p> <p>resisted 74:3</p> <p>resolved 42:10</p> <p>respond 24:15 109:5</p> <p>response 19:17</p> <p>responses 102:4</p> <p>responsibility 14:2, 3 78:22</p> <p>responsible 11:11 25:11 37:13 83:14</p> <p>restroom 76:1</p> <p>result 75:1 82:9 92:12 93:5 107:24 108:10</p> <p>retired 9:21 11:20 16:5,6 65:24</p> <p>returned 96:12</p> <p>review 17:11,24 26:4,7 45:24 46:16 47:19 48:3 84:21 86:12 89:11 90:15, 17 108:24,25 109:1 113:9</p> <p>reviewed 19:21 84:16</p>
---	--	--	--

reviewing 24:4 47:21	14:12,13	16:12 19:6 20:12, 15,17,18 27:8,12 28:11,12 29:23,25 30:1 31:22 33:17 34:17 37:21 41:20 44:7 45:21 46:7 51:17,20 52:25 55:8 56:1 57:5,23 59:19 62:11 64:15 69:12 70:17 78:12 79:18 80:6 82:17 94:9,18 101:16 104:14 106:3,6,15 109:19 110:23 112:3	sealed 10:17,19,20
rewind 26:2	room 9:16 11:4 107:20		search 80:24,25
ride 7:11	rose 41:23		second 46:19 67:14 71:7 89:9
right 8:24 9:8 16:17,22 18:18 21:12 24:17 30:19, 25 34:2,18 36:16, 23 38:15 40:2 50:11,12 58:16 59:7 66:23 67:22 68:10,13 70:11 71:5,6 75:17 88:2 94:20,22 101:12,13 102:18 106:10 111:20,21	roundabout 32:17		section 45:25
	rule 58:22		security 25:12 27:1
	run 20:1 34:10 64:14,16 79:16 96:16,25		see 17:14 18:20,22 22:3,17 26:14 33:2, 13 35:12 38:23 39:23 45:15 50:6, 18 59:20 63:15 64:7,10 66:23 90:18 93:15 113:10
	running 96:25 97:1		seeing 103:2
	runs 14:17		seek 6:2 103:14
	<hr/> S <hr/>		seeking 34:8
right-hand 45:14, 15	safe 27:8,12 45:21	saying 10:8 29:7 30:25 49:2 52:21 62:5 71:17,18,24 72:2 73:10 77:2 78:10 109:3 111:20	seem 69:16
rights 21:10	said 4:8 9:11 19:22 21:23 31:22,24 33:10 36:6 37:6 41:11 50:8 51:21, 23 53:16,17 55:10, 24,25 56:4,5,9,10, 17 57:14,24 59:19 60:20,23 61:2,25 62:2,3 64:23 68:19 69:18 71:23 72:4,7, 18 79:9 84:17 88:20 93:18,20,21, 23 94:21 96:5 99:2 101:18 107:22,23 112:22 113:18	says 18:20,22 50:9 68:21 91:16,20	seemed 53:14
rise 81:23,24 82:3		SBI 97:16,20,22 100:13	seems 50:7
road 6:23 39:23,24, 25 40:4,7 106:24		scare 105:3	seen 55:14 64:7
Robinson 4:6,9 18:17,19 19:3,5,12, 13 20:21 21:1,5,12, 18,20,25 22:2,4,7 36:25 37:24 45:2,4 46:2,5,10,15 47:16, 18,21 48:1,11,15 66:17,20,22 67:3,6 71:3,10 76:6,19,21 78:3,5 84:4,9,12 86:3,8,16 87:17,20 89:1,4,8 90:9,16, 20,23,25 91:8,9 101:15,17,23 113:8,13	same 14:19 15:1,7 22:13 23:14,15 49:9 62:6 93:17	scared 105:4	self-defense 112:25 113:4
role 37:2,4 94:15 113:4	sat 10:20 17:4 27:15 32:25 37:2 52:9	scenario 24:16 113:5,6	self-protection 47:1
roles 8:18 13:15	saw 17:15 53:2 57:20 87:16 97:2	scenarios 24:15	send 25:12 29:4 34:17,22
	say 7:14 10:1 14:24	scene 10:23	senior 5:20 14:10
		scenes 9:14	sent 21:5 29:7
		school 5:16,17 6:15 7:7,9 20:4,11 24:11 80:25	sentence 19:14 47:4 68:21 71:7 91:17,22 93:8
		scope 78:12	sentences 47:5
		screen 22:11 90:10	separation 59:9,10, 13 67:25 68:8,11
		scroll 17:24,25 18:18 22:13,15 71:3 90:16,17 91:8	September 91:3

sergeant 7:11 14:9, 15,16,25 15:6,9,12, 13,14,21 49:20 54:5 55:17,19 58:12 93:22	11:22 12:14 16:4 17:8,15 26:1 29:4, 11,14,17,18,22 30:11,19 31:3,6,9, 20,22 32:6 33:6,7 35:20,24 36:2,4,5 43:24,25 49:25 55:22 56:18 57:14 63:1 98:7 110:2,11	112:19 shoulder 65:7 97:11 shouldn't 59:23 112:24,25 showing 89:24 shows 22:1 113:17	slam 60:3,19 69:11 slammed 58:20 59:1,23 60:17,20, 23 slamming 68:24 69:9,13 slight 107:5 slow 84:9 107:11 slowing 107:4,6 small 25:1 28:18 snakes 105:4 sniff 80:5,7 snippets 52:22
sergeants 15:18 serious 92:9 110:13,17 serve 8:1,17 53:8 93:9 served 15:25 service 25:8 58:14 111:16 services 44:5 serving 14:6 92:18 set 12:8 43:5 seven 102:16 several 74:2 95:2 severity 109:25 sex 8:13 10:6 sexual 110:12 shake 33:8 shall 46:21 47:1 share 108:18 Sharika 4:9 Shaw 18:20 she 36:23 49:4,5, 10,11,14 53:5,6,14, 16 87:3,4,7 93:2,7, 13 95:23 Shearin 12:23 13:3 83:17 Shelton 13:4 75:18 sheriff 4:19,20 6:19,20,23 7:3,20	sheriff's 6:9,17 8:5 9:14 11:2,18 12:1 13:12 25:11 33:18 34:3 35:9 38:17 45:9 47:7 58:14 66:8,11 71:25 72:10 75:8,10 78:6 82:25 85:10,12 87:14 88:17,19,23, 25 105:11,15,21,25 106:1 112:18,23 113:1 sheriffs 110:7 shift 14:8,17,18 15:20,22 24:24,25 25:15,18,19 53:11, 12 76:10 81:21 shin 67:11 shoot 42:19,21 shooting 97:22 100:12 shootings 59:4 short 10:21 shorter 42:22 shortly 28:13 99:23 shot 95:5,16,17,22 112:18,19,23,24 shotgun 95:2,3,4,5 should 21:11 29:6 48:12 50:1 111:1,3	sic 111:5 side 14:19 40:7 sign 19:15 34:21 91:13 signals 107:10 signature 22:23 90:11,18,21 signed 91:4,5 significant 103:24 104:4,7,8,17 106:18 simple 41:17 simply 64:8 simulated 75:23 since 9:6 32:13,20 33:15 59:9 62:23, 24 75:6 single 12:22 28:23 100:4 sir 22:12 86:10 sitting 33:5 situation 10:15 46:25 74:7 79:12 80:19 88:11 103:12 situations 11:13 79:15 108:16 size 98:5 skim 84:8	so 4:15,20,24 5:1,5 6:8,9,22 7:2,19,20 8:4 9:7,11 10:7 11:16,25 12:18,21 13:6,12,17 16:5,8, 24 18:11 19:6,21 20:9,12,22,23 21:14,21 22:4,9,17 24:2 25:8,9,12,17 26:8,18 27:5 28:25 29:9,15,20 30:5,7, 13,22 31:4,15 32:24 33:2,13,15, 17 34:13,20 35:6 36:6 37:1,11,18 40:10,21 41:4,11 42:14,20 43:13 44:6,20,23 45:1,21 46:9 47:11 49:1,11, 18 50:25 51:22 54:23 56:25 57:13 58:3,5,8,16,21 60:25 62:7,9 64:7, 21,22 66:7 67:7 68:3 69:5,25 70:25 71:24 72:18 73:10, 18,25 76:13 77:9

78:6,9,15,18 79:9 80:22 81:17 83:22 84:13 85:16 86:21 87:1 89:9 90:10,17 91:10,15,18 92:14 93:14,15,18 97:10 99:2 103:1,2,6,21 104:23 105:10 106:11,12,19 107:1,7,14 108:22 109:2,25 110:15,18 112:18 113:4 social 27:1 soft 63:20 64:22,24 65:1,4,6,8,9 71:12 soft-hand 65:13,14 68:1,3,4,9,12 74:12,19 soliciting 110:12 some 8:2,17 9:20 11:2 13:1 14:24 16:15,17 18:8 20:7 23:24 24:14,23 25:19 26:24 27:5, 12,13 28:20 34:14 37:5 39:23 40:14 47:7,13 48:7 49:24 51:20 54:17 55:1,2 59:7 60:4 71:4 73:9 76:13,14 78:4 80:1 84:9 91:8 99:9 100:11 102:20 111:12 112:6 113:9 somebody 11:6,10 42:25 43:1 49:23 65:5,7 74:7 82:16 112:23 113:1 somebody's 34:11 65:2 95:1 somehow 32:19	someone 12:3 40:25 47:3 59:11 63:18 67:17 70:17 80:15 81:2,17 104:21 112:14 something 11:1,10 32:23 34:2 38:14, 15,18,21 40:25 41:1,17 42:6,21 43:3 53:16 64:8,12, 13 66:23 76:23 83:9 101:16 105:23 Sometime 52:2 sometimes 8:3 12:3 15:13,14 25:2, 12 27:24 28:5,6,16 65:4 70:12 79:25 somewhat 89:19, 21 somewhere 104:2 sorry 36:1 52:19 59:16 67:5 80:6 86:11 88:20 100:7, 15 sort 7:12 40:17 81:1 soup 105:13 speak 11:22 57:13 78:16 speaking 49:18,19, 20 specialist 87:22,25 specialized 8:13 specific 12:16 24:9, 20 79:22 specifically 10:8 16:25 26:11,12 27:18 28:1 57:13	specifics 35:10 83:7 specified 91:25 speed 97:4 107:10 speeding 53:3,5 spoke 54:1,25 55:4, 8 56:10,15 57:12 94:11 103:5 spoken 49:23 spray 46:21,24 47:8 63:21 64:24 65:11,16 69:19,21 70:7,9 73:25 74:3, 11 sprayed 70:22 74:9 108:8 spraying 46:25 staff 15:15 Stainback 13:5 stand 109:12,13,14 standard 54:10 57:3 108:24 109:1, 8 standards 29:5,7, 11,25 34:12 35:2 60:1 stands 36:21 start 23:6 34:9 40:20 41:24 51:24 66:24 91:19 99:10 107:3 started 6:4,16 7:2, 19,20 8:5 9:19 33:4 34:6,24 35:8 95:4 96:25 98:18,21 99:2 100:1 108:5 starting 13:17	15:15 starts 63:19 67:11 state 5:5 14:1 statement 50:6,18, 21 55:14 61:5 90:8 statements 42:4 51:22 77:13,15,16, 17 stay 109:13 staying 58:1 step 14:15 24:22 steps 43:4,5,8 44:12,15 still 11:1 28:14 64:4 stood 36:20 stop 18:18 40:6 107:22,25 stopped 36:5 106:24 107:2,21 stops 79:25 straight 25:21 60:12 stray 80:11 stretch 109:13,20 strike 73:7,11 75:22 striking 73:15 struck 73:18 75:24 structure 13:12 student 91:5 stuff 14:7 17:7 26:19,22 27:5,12, 13 40:6 63:13 Subdivision 91:25
--	--	--	---

<p>subject 42:8 60:4 71:19,25 72:11,19, 23 73:5,14 74:10 75:1,25 76:9 77:24 79:8</p> <p>subjects 79:6,8,10</p> <p>submit 34:12</p> <p>submitting 52:3</p> <p>subpoenas 8:2</p> <p>subsection 92:1 93:3</p> <p>substance 85:9,23</p> <p>substances 85:5, 11,17</p> <p>substantiatable 111:5</p> <p>substantiate 61:4</p> <p>substantiated 61:7, 10 111:4</p> <p>substitute 71:12</p> <p>succumbed 105:12</p> <p>such 59:25 65:10, 15 82:2</p> <p>sue 105:15,17,21, 23,25 106:1,4,6,9, 10,11 107:15</p> <p>sued 62:12 105:20 106:12 107:24 108:1,11,14</p> <p>suing 62:1</p> <p>suit 61:24 62:23,24 82:18 105:12</p> <p>suits 82:9</p> <p>summarize 53:1</p> <p>supervise 15:18</p>	<p>supervised 15:19, 21</p> <p>supervises 14:18</p> <p>supervising 15:13 81:22</p> <p>supervision 98:22</p> <p>supervisor 8:18 14:14,16 15:5 40:17 41:12,15,16 43:12 54:10 104:20,22 110:23</p> <p>supervisors 49:16 56:7 110:20,24</p> <p>supply 80:25</p> <p>Supreme 76:15</p> <p>sure 7:10 8:22,23 17:19 41:16 49:24 54:11 56:7 108:23</p> <p>surprised 85:19,21</p> <p>suspect 85:20,22 108:2,3,4</p> <p>suspect's 61:5</p> <p>suspects 80:12 82:5,8 96:1</p> <p>suspend 44:4</p> <p>sway 106:8</p> <p>swear 29:23</p> <p>sweep 60:7</p> <p>Swilley 83:18</p> <p>switched 6:24</p> <p>sworn 4:3 13:25 24:23 25:25 26:1 27:2</p> <p>system 6:15 93:9</p>	<p>T</p> <p>take 14:5 17:21 21:14,16 25:8 35:20,22 36:8,9 40:15 42:10,16,23 43:3,5 45:5 47:19 52:13 67:1 79:7 84:8 86:12 95:1 97:12 99:16 102:8 109:15 113:8</p> <p>takedown 53:18,19 60:6 67:16 69:2 75:25</p> <p>taken 10:22 79:15, 21</p> <p>takes 42:20 67:13 75:14</p> <p>taking 35:3 55:21, 22 79:5</p> <p>talk 16:24 24:12,13 32:6 36:14 42:5,7 43:16 47:13 58:1 59:7 62:13 75:4 93:14 98:12</p> <p>talked 31:21 43:11 49:14,15,24 62:3,4 64:21 66:8 77:12, 20 83:22 93:21,22, 25 113:16,25</p> <p>talking 33:18 46:9 51:13 54:18,20 55:15,16,17,18 57:7,20 82:16 86:9 94:23 103:7</p> <p>tally 32:19 61:12</p> <p>tapes 48:24</p> <p>Tasers 65:11,15</p> <p>team 16:3</p>	<p>tease 69:5</p> <p>technique 60:1,10, 16,18 65:14 67:10 68:1,3,4,9,12 71:13</p> <p>techniques 60:5 63:21 65:13 71:19 72:11 74:12 75:20, 21,25</p> <p>telephone 41:17</p> <p>tell 5:10,19 6:8 26:11 27:18 29:9 31:12 40:12 42:14 43:4 44:5 53:20 54:7 55:11 57:7 60:4 67:8 74:1 76:16 96:18 101:7 111:9</p> <p>telling 103:10,22</p> <p>ten-minute 21:17 109:16</p> <p>tenure 78:12,16 94:17</p> <p>term 58:7 108:20</p> <p>terminated 18:24 19:2,7 58:4 81:6</p> <p>termination 58:16 59:10</p> <p>terminology 13:22</p> <p>terms 9:9 14:2 26:21 35:16 47:14 58:5 98:16</p> <p>tested 85:14</p> <p>testified 4:4 59:3</p> <p>testify 5:1 10:3</p> <p>testimony 5:3 54:23 61:5</p> <p>than 6:15 14:11</p>
--	--	--	--

39:14 42:21 46:24 61:14 65:10,15 68:1 70:12 101:5,8, 18 103:2,11 Thank 21:17,18,23 84:24 108:15 that 4:16,21 5:2,19 6:6,22 7:8,12,19, 22,24 8:14,21 9:11, 12,17,23,25 10:8,9, 19 11:1,6,9,10,13 12:2,12,13,23 13:7, 13,20,21,23,25 14:4,5,7,8,17,23,24 15:12,18,19 16:11, 12,15,18 17:6,7,12, 16,19 18:12,23 19:6,7,25 20:8,10 21:23 22:1,3,5,6,23 23:7,9,14,22 24:9 25:5,8,10,23 26:1,4 27:5,8,12,19 28:5, 7,15 29:2,6,7,9,25 30:1,19,22 31:12, 14,15,16,18 32:3 33:4,9,12,14,15 34:2,7,9,19,23,24, 25 35:1,3,17,18,19, 22,25 36:2,18,20 37:3,6,10 38:5,13, 15,17,18,22,25 39:20,22 40:1,2,5, 6,9,15,18,25 41:1, 2,7 42:1,7,8,17,20 43:3,5,7,21 44:11, 21 46:7,13,19 47:4, 6,8,14,16,19,22 48:7,12,22,23 49:1, 5,9,16 50:2,25 51:3,10,14,16,25 52:1,5,8,14,15,16 53:1 54:18,23 55:3, 5 56:12,15,16,20, 22,25 57:2,4,9,16	58:3,4,13,24,25 59:3,14,20 60:1,2, 21,22,23 62:10,16, 21,25 63:4,13 64:7, 11,13,15,16 65:3,5, 8,11,17,18 66:3,5 67:12,17 68:4,13, 15,19,20 69:3,5,10, 12,18,24 70:5,9,10, 11,14,18,19,20,22 71:8,11,15,17,18, 23,24 72:2,18,22 73:4,6,9,13,16 75:12,13,14 76:25 77:3,13,14 78:15, 22 79:16 80:6,10, 11,13,21 81:3,4,5, 17,21,22 82:1,2,3, 19 83:5 84:5,8,14, 15,17,18,20 85:3, 23 86:1,6 87:16 88:16,18,20,23 89:5,10,25 90:21 91:17,21 92:8,21, 24 93:14,18 94:10, 21,22 95:9,16 96:1, 6,13,15,18,24 97:12,18,21 99:10 100:24 101:3,4,5,7, 10 103:8,11,14,18, 21 104:2,7,12,17, 19,20,22,24,25 105:3,12,24 106:5, 7,21,22,23 107:14, 17,24,25 108:11 109:2,4,6,8,22,24, 25 110:3,7,9,11,14, 20 111:2,9,11,13, 18,22,25 112:12 113:6,17,19 that's 9:6,8 13:22, 23 14:2,10 17:23 18:6 19:19 23:15 24:17 28:9 29:19	30:12,25 31:8 34:6 38:19 40:3 43:17 44:22 46:1 52:7 55:3 56:15 58:5 59:6 62:10,15 63:2 69:22 71:2,4 73:15 74:19,21 75:14 80:18,22 81:1 82:7 86:2,18 88:22 94:11,13 95:5 96:14 97:24 98:1,7 100:19 101:12 102:23 106:18 109:21 111:19,20, 21 the 4:15,16,18,19, 24 5:5,19 6:11,14, 16,23,24,25 7:7 8:2,22,23 9:3,9,14, 15,16 10:16,17,18, 19,20,23 11:2,3,11, 17,19,25 12:4,5,7, 8,9,11,14,19 13:3, 6,10,11,12,15,17, 18,20,22 14:1,3,5, 6,11,12,13,15,16, 17,18,19,24 15:1,7, 8,10,11,14,15,17, 19,21,22,24 16:2,3, 4,16 17:1,5,6,8,9, 12,13,14,15,16,23 18:6,12,25 19:3,14, 20 20:3,5,14,22 21:7,25 22:11,13, 17 23:5,6,9,14,15, 22,23 24:22 25:11, 13 26:7,13,14,20 27:6,8,9,10,13,15, 16 28:6,17 29:3,4, 10,12,13,15,17,18, 21,22,23,24,25 30:4,7,8,10,11,13, 15,17,19,20,21,22 31:3,4,6,9,16,20,	22,24 32:3,4,6,19 33:3,4,7,11,12,18, 20,21,22,23,24 34:3,6,8,13,15,16, 21,22,24,25 35:4,5, 9,14,19,22,24 36:2, 6,16,19,20 37:4,9, 10,13,19,25 38:1,3, 6,8,17,19,20,23 39:1,2,23,24,25 40:3,4,6,7,15,16 41:11,12,14,15,16, 23 42:3,7,11 43:4, 16,20,24,25 44:1, 12,15,19,23,24 45:2,7,12,13,14,15, 18,23,24 46:8,12, 14,16,23,24 47:6, 13 48:7,11,12,19, 21,22,23,24 49:6,7, 8,16,22,24 50:4,7, 13,14,22,23,25 51:2,7,21 52:2,3,5, 12,17,22 53:3,4,7, 8,9,12,13,14,15,16 54:1,4,9,10,18,19, 20,21,22 55:3,6,13, 20,22 56:7,13,14, 21,25 57:5,7,19,20, 21 58:7,8,11,12,14, 16,20,24 59:1 60:3, 11,12,13,17,18,20, 24 61:4,11,12 62:6, 15,16,22,24 63:4,6, 8,10,17,19,24 64:6, 7 65:1,4,5,9,12,13, 18 66:4,6,7,8,11,12 67:5,13,14,15,16 68:1,2,20,21,24 69:4,7,9,12,16,20, 23 70:14,19,24 71:7,8,11,16,19,22, 25 72:2,3,6,10,11, 14,19,23 73:5,7,8, 15,18,20,22 74:4,
--	---	--	--

10,11,17,19 75:3,4, 5,7,10,11,17,19,21, 22,24 76:1,4,8,11, 14 77:7,8,13,19,20, 22,24 78:6,10,12, 18,20,21 79:5,6,7, 8,9,17,19,23,24 80:1,4,7,12,15,18, 23 81:1,2,8,20,22, 24 82:7,8,25 83:7, 9,22 84:5,11 85:6, 7,8,9,10,12,13,23 86:3,4,6,15,22,23, 24,25 87:5,6,7,13, 14 88:13,16,17,18, 19,21,22,24 89:17, 23 90:2,3,4,5,6,8, 10,11,15,19 91:2,3, 7,10,12,13,14,15, 25 92:3,5,11 93:4, 9,17 94:9,10,25 95:1,2,3,4,9,12,24 96:10,11,12,14,15, 16,19,21,22,23,24, 25 97:1,2,3,4,6,8, 11,16,20,22,24 98:1,5,7,19,22,23 99:1,12,15,25 100:1,3,5,9,10,11, 13,19,23,25 101:1, 2,3,4,20,21 102:1 103:2,3,7,10,17,19, 21 104:10,23 105:11,15,20,21,25 106:1,8,22,24,25 107:1,4,11,12,13, 19 108:2,3,4,5,6, 10,11,14,17,18,19, 20 109:3,23 110:2, 10,19 111:14,15, 18,19,20 112:3,10, 12,14,15,16,17,21, 22 113:2,5,11,16, 17,18,19,25	their 41:5 44:5 55:6 65:2,3,7 72:16 74:18 78:18,24 83:8 85:17 96:4 98:11 100:25 them 6:13 12:19,23 15:13 21:11,13,14 38:4,22 40:16 41:19 44:5 54:16, 25 55:8,25 60:13, 14 61:4 65:3,8 66:5 74:3,8,9,11,17,19, 20 79:17,24 82:5 83:24 93:9,24,25 97:15 98:4 99:9 103:9 106:20 108:21 112:25 theme 101:12 themselves 79:18 then 4:16 6:13,16, 24 7:1,11,12 8:5 11:5 12:7,13,14 13:2,21 14:3,9 15:4,9,14,15,23,25 16:3 17:5,8,9 23:7 25:14,16,21 26:8 27:16 28:13 29:11, 13 30:13 31:4 34:19,21 40:5,18 43:19,22 44:21 45:10 52:11 56:23 57:8 60:12,13 63:20,22 64:11 74:8 75:5,6 78:8,9 79:19,24 91:21 95:14 96:14 98:4 100:13 101:1 106:23 107:7,11,24 108:13 112:24,25 113:2,10 there 4:21 8:3 11:21,25 12:16,19 13:6 14:17,20	15:11,20,25 16:1 24:18 25:4 28:11 32:14,15 36:12,17 38:4 39:4 43:4 44:6,9,12 52:5,18, 20 53:7,13 61:8,9 69:20 71:6 73:5 74:6 78:12,17 79:1, 12,24 80:16 81:8 82:1,12 83:15 84:24 86:24 87:4 96:15,21,22 98:4 100:18,22 101:2 103:11,17 104:19 106:21 107:6 108:12,24 109:1,2, 5,8,22 111:1,3,24 112:9,11 there's 4:20 12:22 28:8 32:13 39:14 42:11 74:9 80:23 82:18 83:18 95:25 106:5 111:11 thereafter 99:23 thereby 92:2 these 21:10 22:20, 23 23:1,25 25:14 33:1,3 37:2 42:16 46:4 50:3,14 51:6 57:1,3 67:18 74:25 79:4 82:20 85:14 93:16 98:18,20 99:3,4 100:3,10 they 9:15 11:10 12:3,21 14:22 15:14 26:14,15,16 27:23 28:19,21 34:18,22 38:22 40:23,24 41:5,19 42:15,22,23 44:13, 16 46:5 54:7,8,11, 12,17,19,21 55:2, 25 56:1,4,7,9	59:14,20 61:25 62:8 70:12 74:10 77:15,18 80:2,16 82:17 83:12,16 85:14 95:20,21 96:3,6,10,12,25 97:1 101:8 107:23 108:5 112:19,24,25 they're 15:4 38:11 82:24 83:1 they've 79:23 thick 36:22,23 thing 62:5 66:3 94:9,10 106:3 109:10 things 7:25 9:2 10:5 16:10 25:14 26:18 42:16,24,25 51:21 57:4 65:20 113:10 think 6:21 17:13,14 19:19 20:7,24 21:11 23:22,25 31:14,16,20 36:4 50:1 53:4,6,9,15 62:13 70:14 76:7 80:23,24 81:4 83:1 87:15 101:16 102:21 104:1 108:13 110:14 111:18 112:15,16 113:2,8 third 67:15 92:2 this 17:19,21 18:8, 11,15 19:10,14,19 21:5 22:20 24:1,21 25:2,3 26:19,22 27:12 28:18 31:1 32:9,12 33:13 34:2, 3,17,18 36:23 41:20 44:2 45:8,10,
---	--	---	---

14,18,21,25 46:1,2 47:1,11 48:3,5,16, 17,20 49:12 50:14 51:15,16 53:21 54:2 55:12,20 56:6 57:11,13 58:19 61:13,24 62:4 63:7, 8,23 64:21 66:15, 17 67:1,7,8,9,10 69:12,16 72:9 75:7 76:16 78:10,11 82:18 84:1,13 86:12,13,17 87:1,9 89:14,22 90:2,15, 17 91:1,2,10,12,25 93:7 98:21 101:19, 20 102:8 106:6 108:23 109:3 110:15 113:15	three 6:15 12:10,22 27:9,24 28:3 32:5 94:22,23 101:9 three-person 12:12 threshold 109:22 thresholds 110:8 through 7:9 13:18, 19,21 20:1 26:16, 17 27:6 33:5 34:16 37:18 38:24 40:14, 21 51:13 55:12 57:6 64:16 75:13, 14,21,24 83:6 85:6 98:20,25 99:1 103:3 107:9 time 5:14 7:10 10:16 12:10,22,25 14:8 15:11 25:9,14 27:5,13,14,15 28:6, 23 32:3 34:19,20 35:22 36:6 37:4,19 45:1 49:24 52:4,6, 17,22 54:17,19 55:1,2,3 62:6,25 63:5,12 64:7 65:19, 23 73:6 75:3,5 77:8 79:18 81:22 83:15, 17,20,21 96:6 98:20,23,24 99:15, 17,19,20 100:20 103:10,17 106:21 107:14,19 108:1 109:4 timeline 30:3,4 times 12:10 16:1,2 38:4 62:22,24,25 63:2 72:22,23 73:1, 8 95:2 100:12 105:11 106:14,15, 16 to 4:2,7,8,18,22 5:1,	16,21,23 6:14,21, 24 7:1,7,11,23,24 8:6,8,9,11,17,21 9:8,15,22 10:2,5,7, 24 11:22 12:11,14, 15 13:24 14:9,12, 15,22,25 16:3,4,24 17:1,4,8,9,14,18, 22,25 18:2,8,13,16, 23 19:3,6,10,15,20 20:1,2,4,9,11,22 21:10,13,14,19 22:4,6,8,9,10,13 23:3,6,7,8,24 24:2, 11,15,17,19,24,25 25:1,7,8,13,15,17, 18,19,22,23 26:21, 24 27:3,7,8,12,15, 18 28:21 29:3,4,5, 7,8,10,11,13,14,16, 17,18,23,24 30:2,7, 8,10,14,18,19,21, 23 31:3,5,6,17,20, 21,25 32:6,11,15 33:11,13,24 34:10, 12,14,20 35:1,11 36:18,19 37:1 38:2, 5,11,18,23 39:5,8, 9,10,11,12,13,19, 20,25 40:2,4,6,7, 16,19 41:1,3,4,12, 14,16,19,23 42:6,7, 10,17,19,21 43:6,9, 16,17,20,22,23,24, 25 44:1,3,4,5,12, 13,23,25 45:5,21, 24 46:3,6,8,16,20, 23 47:7,10,11,13, 22,25 48:2,9,19,24 49:14,15,18,19,20, 22,23,24 50:1,2,4,8 51:14,17,20,22 52:16 53:7,8,9,13, 15 54:2,11,25 55:4, 8,15,16,17,18,22,	25 56:2,4,7,10,15, 23 57:3,7,9,13,14, 17 58:1,18,24 59:1, 24 60:3,9,13,18,20, 24 61:20 62:12,14 63:14,16,17 64:5,7, 8,10,12,22 65:9,13, 17,20 66:12,13,21, 23,24 67:9,12,22 68:4,14,21,24,25 69:3,7,11,13,17 70:5,7,9,11,14,19, 20,24 71:7,23 72:6, 7,22 73:2,4,5,6,10, 14,23 74:2,3,7,8, 10,11,20 75:3,4,22 76:1,5,10 77:1,24 78:21,22,23 79:4,7, 16,18,25 80:3,4,7 81:4,10,11,17,23, 24 82:3,5,17,19,20 83:5,6,19 85:1,3, 10,14,17,24 86:2,7, 9,18 87:6,7 88:11, 12,16,22,24 89:10, 11 91:7,13,20 92:1, 2,3,4,7,10,11,14,15 93:4,9,10,15,16 94:2,6,12,22 95:1,3 96:14,16,19,23,24 97:1,15,16 98:6,12, 14 99:17 101:2,22 102:8,11,18 103:15,19,20 104:4,11,16,17,20, 24 105:2,12,15,17, 21,22,23,24 106:3, 4,5,9,10,20 107:11, 16,20 108:4,17,18, 22,23 109:4,12,13, 14,15,19,20,23 110:1,9,10,24,25 111:19,21 112:2, 10,12,16,17 113:9, 12
--	--	--	--

today 5:3	17,19,25 99:1	typically 12:12,18, 19,22 15:17 25:4,9 32:2 41:22 42:9,15 76:13 98:7	University 5:24 6:7 18:20
together 17:7 30:3 55:2	transfer 14:25		unless 31:24 92:10
told 52:9 54:9,12 61:20 62:25 95:2 102:21	transferring 14:24	typing 52:16,22,23	unlimited 112:7
too 16:22 21:6 76:16 78:10 103:18	transpired 52:8 107:25	<hr/> U <hr/>	unpack 73:9
took 11:6 97:14	transport 7:25 107:8	U.S. 6:11	unreasonable 76:24
top 22:17 23:6 45:14,15	trash 39:23,25	Uh-huh 9:10 64:3 96:20 111:4	unsubstantiated 61:8
totally 102:18	tried 53:15 74:2,7, 8,10 96:16 108:4	ultimately 29:1,15, 22 30:5	until 8:17 9:21 25:14 32:20 94:14
towards 22:11 95:5 97:3,4 111:16	trooper's 107:1	uncontrollably 69:2	up 12:8 13:18 14:15 16:3 17:18 19:11 20:21 21:25 25:13 32:19,23 33:14 34:17 41:19 45:3 47:17 48:21 58:8 66:12,22 67:1 70:24,25 71:5,6,8 82:16 84:1 86:3 87:17,18 89:2,10, 24 91:8 101:11 104:18 107:2,12, 18,22 109:12,13,14
town 28:18 62:7 111:12,13	truck 107:8	under 33:6 37:10 59:25 67:21 73:14 88:18,24 92:24 93:2,4 98:22 112:19	update 75:12
track 38:22	true 67:17 105:3	undergo 7:6	updates 75:14
trackable 38:25	try 40:16 53:8,9 59:24 79:7	understand 13:11 14:12,13 30:2,15 37:1 43:7 44:11 51:4 77:1,2 103:9 108:23 109:24 110:15	upon 91:24 92:12 93:5 96:10
traffic 40:5 79:25 107:3,4,6,10,21,25	trying 27:7 28:21 30:2 57:12 73:6,10, 14	understanding 46:23 78:15	us 13:21,25 17:25 18:2 26:25 32:5 34:22 62:1,14 67:8 75:14 79:22 90:14 91:13 102:8
trailer 107:12	turn 11:10 12:3,4 56:23 66:21 79:18	undetermined 25:13	usage 85:24
train 75:10,19 80:4, 7 85:17 88:11,12, 24	turned 9:15 10:24 53:3 97:3	uniform 64:6	use 13:3 39:11 40:11 42:8 46:22, 24 47:3 48:9 50:22, 23 58:5,7 66:4 69:21,23 70:14
trained 7:3 47:8 60:3 78:23 82:21 85:24 99:12 103:22	two 4:24 7:15,16,17 15:17,18 16:2 27:23 32:5 92:18 96:1 108:13	uniforms 25:1,6	
trainer 88:2	two-man 75:24	Union 23:21	
training 7:5,9,12 14:2 29:5,7,11,24 34:11 35:2 36:21 46:21,25 60:2 66:9 69:10 71:22,23 72:4,7 73:16 75:12, 13,17 83:2,6,8,13 85:5,11,14 87:18, 19 89:4,15 91:3 98:9,10,11,12,14,	two-year 19:15	unit 15:12 79:2,13 95:1	
	type 7:5 8:10 9:7 33:15 38:7 42:17 44:9,10 75:2 100:2	units 78:7	
	types 8:12		
	typewritten 52:18, 20		
	typical 11:25 37:19, 22 41:11 42:11		

71:11 72:19 73:5 75:11 77:20,23,24 79:24,25 81:9 83:9, 22 88:13,21 89:23 91:15 92:4 93:11 96:13 97:21 99:7,9 use-of-deadly-force 90:11 use-of-force 16:10, 14 40:13,14,21 41:8,9 44:9,24 45:3,22 48:21 50:24 51:6 52:3 58:23 61:1 63:11, 18 70:25 72:20,24 74:25 75:4 98:15 99:4 108:25 used 17:23 18:12 23:3 59:24,25 64:22 67:25 68:22, 23 69:19,25 73:25 74:12 80:2 82:2 83:19,24,25 85:5, 10,16,24 88:24 90:7 92:25 93:8 94:16,19 using 77:22 88:10, 25 90:6 91:24 utensils 82:25	75:7,10 76:15 78:6 82:10 85:10,16 87:13 88:17,19,22, 24 89:18 98:2 101:13 103:8 104:11 various 28:8 vehicle 96:10,15, 18,22,25 verbal 53:5 63:20 64:23 verbatim 53:2 very 61:2 77:19 93:15 102:21 104:7 107:9 vest 107:3 via 21:5 victim 58:20 victims 43:15 victims' 107:1 view 52:10 violated 58:25 59:14,20 violence 110:22 111:1,7	WALLACE 4:2 want 4:8 11:22 13:24 18:8 19:10 21:12,13 24:19 37:1 41:14,16 44:23 47:10,13 50:3 61:20 63:16, 17 66:13,23 69:17 70:14,24 75:23 82:20 86:2 91:20 98:12 108:22,23 109:15,19 113:9 warehouse 86:23 113:20 warehouses 86:23 warrant 93:10 warrants 8:1 53:7, 8,14 92:18 96:8 was 4:3 5:14 6:6, 11,18,21,22,24 7:1, 12,16,18,23 8:8,11, 16,20,22 9:1,2,3, 15,20 10:18,21,22, 24 11:1,11,25 12:12,16,19,23,24 15:13,19,20,23,24 16:4,6,7,17 17:3,5, 13,14,16 19:17 20:15,17,18 21:21, 23 23:22 24:22 25:17 27:2,17 28:11,23,25 29:16 30:5,6,18,19 31:16 32:1,3,6,7 33:2,9 34:15,23 35:1,3,5, 6,7 36:12,17,22 37:3,9,16 38:4,5, 17,23,24 40:4,15, 17,18,25 41:15 42:7 43:4 44:6,9,21 46:11 48:14,22,23 49:9,12 50:13,22	51:12,13,14 52:5, 22,23 53:7,23 54:1, 4,13,18,20,22 55:1, 5 56:14,25 57:2,19 62:5,9 64:13 66:19 68:14 69:1,3,7,9, 13,17 71:12 73:5,6, 14,16,20 75:3,15, 17 80:11 81:2,3,5, 22 84:3 85:13,24 86:14,23,24 87:1,3, 4,9,11 88:16 89:7 90:24 92:14,15,18 93:2 94:10,25 95:9, 12,13,14,16 96:13, 15,17,19,21,22,24 97:6,8,11,12,19 98:17,22 99:24 100:1,22,24 101:1, 3,10 102:4,6,7,25 103:3,6,11,15,17, 18,19,21,23,25 104:1,2,4,7,8 106:21,22,23,25 107:4,10,14,16,19, 20 108:6,9,21 109:7,8 111:14,16 113:17,19 wash 34:20 wasn't 5:14 10:19 21:24 33:12 34:4, 25 36:6 51:10 77:9 87:4 95:23 103:1, 25 109:6,7,11 112:23 113:24 Watkins 12:24 13:4 49:14,21 55:15 56:11 58:12 93:23 94:8,10 Watkins' 56:14 way 4:21 5:11 28:24 32:13,22 33:9 34:15,24,25
<hr/> V <hr/>	<hr/> W <hr/>		
vacant 81:2 86:23 vaguely 31:14 63:12 Vance 5:20 6:14,16 7:8 8:5 10:13 11:2, 14,17 13:12 35:2 45:8,9,21 58:14 66:7,11 71:18,21, 24 72:3,7,10,14	wait 25:22 waiting 25:5,18 Wake 23:17 walk 33:7 37:18 41:19 55:12 56:24 walked 31:20 53:6 103:4 walking 65:7		

35:5,21 43:9 72:6 82:3 87:10,12 93:17 106:8 110:10 111:15 Wayne 23:16 we 4:24 12:2,7,13, 16 13:20 14:9 15:17 16:1,2 17:7, 23,25 18:12 19:11 20:24 21:5,16 24:10,12,13,14 25:1,9,10,14,19,20 28:5,7,8,13,16,18, 19 29:4,12 30:5,22, 23 31:5,14,16,20 32:1,2,3,7,14 34:2, 20 42:20 45:2 46:9, 10 47:16 52:11 57:12 62:9,12,13 64:21 66:22 67:1 69:9 71:11 75:12, 13,24 76:3,4,7,18 77:12 78:8 79:24 80:21 82:1 88:15 89:9 90:10,18 91:2, 20 94:25 95:7,25 96:7 102:14 103:5, 7 108:9 110:2 113:8,10,16,25 we'd 28:14 we'll 21:16 25:11, 12 70:5 we're 8:4 19:11 20:22 23:6,25 24:25 27:6 29:23 46:9 57:20 60:3 62:12 66:17 79:18 91:13 94:23 we've 28:16 32:15, 20 42:19 62:24 79:5,15,16,17,21	weapon 88:14,15, 16,18,22,23 92:7 weapons 65:10,15 82:22 wearing 69:1 wears 64:6 week 7:14 49:9 weeks 7:15 weighted 85:15 Welborn 49:20 54:5,23,24 55:4,17, 19 56:3 58:12 77:16 93:22 94:6 Weldon 4:2 5:7 well 9:4 11:21 16:15 17:13 21:1,7 24:19 26:2 34:10 36:17 56:10 57:12 58:7 62:3 68:5 69:12 72:9 77:23 84:20 90:15 91:6 93:15,25 97:17,18 103:23 105:2 110:4 went 7:7,9 10:2 14:22 17:9 20:4,11 24:11 28:12 31:9 38:14,15 39:1 53:8, 13 87:7 96:23 100:24 101:2 were 6:20 7:3,24 8:3,6,14,19,24 9:11,17,23,25 10:8, 9 11:21,25 12:21 14:21 15:25 16:2,9, 21 21:4 32:24 33:8 37:6,8 38:4 40:24 41:18 44:12 54:11, 17,19,21,24 55:2 62:13 64:10 73:8, 10 75:1 76:8 77:15	80:2,12,15,16 82:12 83:16,20 88:2 94:14,24 95:7, 25 96:4,11 97:1 99:12 103:7,9,10, 21 104:19 108:14, 18 111:6,7,24 weren't 15:14 76:24 88:6 what 4:8 5:16,25 6:18 7:5,22 8:7,10, 24 9:12,20 10:15, 17,18 11:9,23,25 12:11 13:14 14:9 16:6 17:19,22 19:17,25 24:5,7,22 25:4,9,23 26:9,12, 14,22 28:10 30:13, 25 31:4,22 37:8,11 38:7,9,13,15,25 39:1,7,18,21 40:17 41:7,14,15,21,22 42:1,2,14 43:2,7 44:1,16 46:9 47:4 48:5,12 49:2,12 50:5,13,22 51:2,18 52:4,7,8,10,25 53:19 54:7,8,12 55:8,10,11,24,25 56:4,5,9,12,13 57:7,14,19,20,21, 23,24 58:7,21,22 59:21 61:20,22 62:2,5,11 64:18 66:4 67:8,10,12 68:4,14 69:17 70:12 71:4 72:16 73:3,13 74:4 75:15, 19,20 76:9 77:2 80:14 82:15,23 86:5,6,18,21 88:11, 20 89:3,12,24 90:4, 10 91:12 92:3,14 94:21,24 95:12,15	96:4 97:20 98:9,10, 11,14,24 99:10,20, 21 101:7,8 102:6 103:9,20 105:7,13 107:15,24 108:11, 18 109:19 112:13 what's 9:8 14:9 24:17 45:18 56:8 57:18 60:9 65:12 80:20 84:22 94:11 111:21 whatever 25:6 26:21 28:20 43:18 51:13 81:20 when 7:2,8 8:4,19 9:13,22 10:1,9,19 11:21,25 15:1 16:6 17:1 18:2 22:13 25:5,9 27:14,15,16 28:7 29:3 31:22 33:6,8,17 34:7 35:8,19 37:19 38:10 39:18,21 40:3 41:5,18 48:20 49:4,10 50:8 51:25 54:20,21 55:7,8 56:1 57:1,4 59:10, 13,14,19,20 60:11 64:22 65:22 68:8, 11 75:3,15 79:1 86:19 91:13 92:1 95:4 96:11 98:18, 21 99:2 100:12 101:1 103:21 105:5,8 110:23 111:13 where 5:16,23 6:6, 10 9:25 10:22 11:5 14:19 18:20,22 24:11 28:21 34:3 41:19 50:9,21 63:23 67:24 68:21 74:7,9 79:6,7,15,
---	---	---	---

21,23 80:15 81:1,8, 10,11 82:1 91:4,20 95:7 98:5 108:1 110:25 wherever 62:9 whether 12:15 15:2 17:3 21:22 29:23 30:23 42:4 54:18 55:5 which 14:15,18 15:5,23,24 17:4,23 23:3 34:15 36:7,20 39:4 40:25 43:9 45:13 46:22 48:20 50:15 66:15 68:8 75:1 76:8,22 79:13 80:2 85:12 91:2 92:15 95:25 99:7 100:20,23 103:11, 12 110:21 111:7 112:9 while 6:25 7:11,14 15:25 19:10,11 42:6 47:21 White 4:18,19,20 16:25 17:1 19:6 20:7 24:20 26:13, 24 27:18 28:1,25 29:16,20 30:10,18 31:1,7 32:4 33:7 35:6,8 36:10,11 47:14 49:15,19 51:1,3,6,9,19,24 54:1,20,22,24 55:5, 18 56:18 57:14 58:4 59:22 60:16, 20,23 63:2 68:21, 23,24 69:18 77:4 92:18,21 102:20 White's 18:15 19:22 21:2,22 24:3 26:9 27:20 37:4,20	48:9 50:6,18,21 55:9 58:13 69:2 77:8 who 12:16,21 13:7, 19 14:10,13,20 15:18,20,21 16:9 25:10 28:11,16,18 29:2,20 32:1,4,7 36:17 38:23 40:24 43:23 47:3 49:18, 24 54:1,4 56:1 60:20 61:9,10,14, 17 63:7,18 67:25 70:21 74:3 75:17 80:21 81:19,22 83:16,18,20 85:23 92:6,8 93:8 94:25 100:22 104:11 105:3,21 108:14 113:19 who's 13:19 83:13 whoever 32:3 whole 30:19,21 why 11:8,10 28:3,8 31:16 34:6 36:20 61:25 77:6 81:23 104:8 wife 111:14,17 will 4:10,18 5:5 21:16 24:15 28:10 42:7,22 45:5 46:5, 7,10,22 47:12 65:20 78:12 79:13 84:2 85:6,9,11 106:6 109:2 willing 19:15 21:9 wiped 107:13 with 6:13 7:11 9:21 13:7,21,25 23:25 26:12 28:15,17	32:3 33:14 35:13, 16 40:17 43:11 44:4,23,24 51:1,3, 5,8,19,23,24 52:12 53:5,9 54:10,20,22 55:18,22 56:7,17 57:9 58:14 60:1 61:14,18,19,22 62:14 63:1,7,9,10, 19 65:8 66:25 67:11 69:20,23 76:11,25 77:21 79:22 82:19 84:13, 15,18,21 85:18 86:4,17 88:11,13, 18,21,24 89:17,19, 20,21 91:19,21 93:21,22,23,25 94:11,12 95:2 100:1 101:5,10 102:19,22 104:17, 23 108:5,8 111:12, 14 within 14:8,17 15:5, 8,10 21:9 49:9 100:14,16,17 without 12:4 13:3 33:9 34:13 55:4 65:18 92:10 112:7 witness 4:13 23:23 36:16 42:4 45:23 46:14 48:12 67:5 84:11 86:6,15 90:5, 19 witnesses 43:14 woman 113:18,19 won't 34:12 wondering 97:19 Wood 5:11 wooded 96:23	woods 79:17 97:1,2 word 16:17 70:14 77:22 108:19 words 70:13 106:9 work 6:10 8:1 24:10 25:8 29:10 33:15 38:2,5 110:2 worked 6:12,14,23, 25 8:12 28:12 101:5,8,19 working 6:16 13:25 15:3,9,10 28:17 40:15 41:18 42:15, 23 43:1,2 61:6 81:21 86:24 100:23 104:25 105:10 106:23 107:19 110:10 worse 44:14,15 would 4:21 5:3 7:14,24,25 8:1 11:8 12:2,3,5,7,9,13 13:20 14:21,22 15:18 16:3,9,13,24 17:12 20:12,13,15 22:12 23:5 24:13, 23 25:7,18,21 26:3, 4,6,18,24 27:3,9 28:3 29:10,13 32:5, 6 33:7,8,23 34:16, 18,22 36:23 37:6 38:2,3,4,7,8 39:1,2, 3 40:5,14,15,16,19, 21,23,25 41:7,12, 13,22,24 42:1,3 43:3,5,9,10,14,15, 16,18,19,22,23 44:1 46:3,8 49:15, 23 52:14,15,18,20 60:1 62:20 63:25 64:11,12,14,16 65:1,3,5 75:19,21,
--	---	--	--

24 77:24 80:21 81:17,21 82:3,12 83:15 85:3,19,21 94:18 99:7,22 103:4,20 104:14, 20,21,22 105:3 106:15 110:12,14 112:3,16 wouldn't 20:17,18 27:11 35:12,13,22 39:25 40:2,9 41:3 43:13 53:16 64:8 81:23 82:17,19 87:24 wrap 67:1 wreck 106:23 107:4,17 wrist 60:8 65:2 67:14 write 39:1,8,9,10, 11,12,13,19,25 40:9 75:4 writes 41:14 writing 17:23 31:19 34:21 52:24 written 38:19 39:5 49:5,11 51:13 77:15,16,17 wrong 38:14 wrote 50:22 <hr/> X <hr/> X-RAY 25:13 <hr/> Y <hr/> yeah 16:20 17:12, 13 18:1 29:12 30:17 40:5 41:13	70:15 107:23 year 8:23 9:20 99:10,21,25 years 6:15 12:19 13:6 28:17 65:25 66:4 yes 4:14,17 5:4,21 7:4 10:14 11:15 12:18 16:23 18:21 19:2,8,18,24 22:1, 12,22,25 31:11 33:19 34:1 36:12 39:6 41:6 44:17 46:18 48:4,18 49:3 50:17,20 51:8 56:19 58:17 60:17 61:3,16 66:2,10 67:2 70:4 71:2,23 72:4,8,13,21 73:12, 19 74:14,22 75:9 78:1,8,25 79:3,11 80:17 81:18 82:7 83:11 84:7 86:18 87:2,15 89:13,16, 19,21 90:1,13,22 91:2,12 92:20,23 94:21 95:11,18 97:7,9 99:14 100:5, 22 101:25 102:3 104:6,7 105:9 106:13,18,19 111:8,23 112:11 113:6,21,23 yet 13:19 you 4:12,15,16,21, 22 5:1,5,10,12,16, 19,21,23,25 6:2,8, 10,20 7:2,3,5,14, 19,20,22,23,24,25 8:1,4,5,12,14 9:11, 17,22,25 10:1,7,8,9 11:21,22,25 12:11, 21 13:1,11,18,22,	23,24 14:3,4,9,21, 22 15:1,2,5,7,8,9, 15,23,24 16:5,6,8, 9,13,21,25 17:11, 19,21,24,25 18:3,4, 5,8,11,17,20,22,23, 25 19:10,14,15,21, 22 20:12,15,18,21 21:5,11,12,13,14, 17,18,21,23,25 22:3,6,8,9,10,12, 15,20 23:1,6,7,9,24 24:5,12,15,19,21, 24 25:17,25 26:4,8, 9,11,13,14 27:9,13, 18,20,24 28:3,18, 22 29:3,9,10 31:6, 12,22 32:2,7,10,11, 19,24 33:2,7,8,13, 17 34:9,10,12,15, 16 35:8,9,14,15,19 36:6,7,14 37:2,5,6, 8,25 38:3,7,22,23 39:8,9,10,11,12,13, 18,21,23,24,25 40:2,3,5,9,10,11, 22,24 41:1,11,12, 18,20,21,22 42:14, 16,19 43:4,5,7,9, 10,11,19,23 44:21, 23 45:5,7,10,16,24 46:5,12,13,16,19 47:6,7,8,12,14,19 48:5,16,19,20 49:4, 18 50:3,4,5,6,7,15, 18 51:1,3,5,6,23,25 52:10,13 53:2 54:1, 7,9,15,24 55:8,11, 24,25 56:1,5,10,17, 20 57:5,14,15,18, 19,21,25 58:3,7,9, 18,21,24 59:3,8,9, 13,15,17 60:9,11, 12,15,18,21,22,25 61:1,4,11,13,15,20,	22,24,25 62:3,4,7, 13,16,19 63:7,10, 14,16,17,20,22 64:4,8,10,12,14,16, 23,24 65:25 66:8, 13,21 67:4,8,24 68:2,7,8,11,14,17, 19,20 69:11,18,25 70:2,12,20,24 71:18,21,24 72:6, 18,22,23 73:1,10, 18,25 74:1,4,5,9, 12,15,23 75:1,22, 23 76:1,8,11,12,14, 16,22,25 77:1,13, 14,20 78:3,11 79:4, 9,23 80:7,13,20,21 81:3,5,15,23,24 82:12,21 83:3,9,12, 22,24 84:5,6,13,24, 25 85:1,3,19 86:1, 9,12,17,19 87:7,9, 16,21,24 88:2,6,9, 20 89:1,5,11,17,22 90:14,15 91:1,6,17 92:21,24 93:18,25 94:14,21 96:5 97:13,18,19 98:3, 14,16 99:2,4,10,12, 16,20,22,24 100:3, 6,8,9,12,16,20,21 101:7,15,16,18 102:1,9,11,15,16, 18,20,21,24 103:5, 8,10,13,14,16,21, 22,24,25 104:4,10, 14,18,22 105:2,5, 10,17,19,22,23 106:2,4,9,10,17,20 107:15 108:15,17, 18 109:3,4,10,15, 19 110:7,12,16,23 111:6,18,22 112:3 113:10,18,25
---	---	---	--

you're 5:2 14:4
21:8,9 33:10,17,24
39:23 44:24 49:2
65:6 67:12 77:2,7
84:21 86:7 87:21
89:24 105:6,8

you've 34:18 47:8
48:2 69:25 81:12
84:16 106:12

you-all 31:18 46:6
62:11,22 66:25
80:4 106:10 107:22

young 36:12,17

your 5:3,5,8,10 6:2,
8,18 8:1,2,7,25
16:6 21:10,15
22:23 33:8 35:20
36:8 37:2,4,19
39:24 40:3,12 41:1,
2 44:13 50:5,10,12,
15 51:4,10,19,22,
23 54:23 56:25
57:18 58:9,21
59:21 64:11 65:22
67:21 68:15,17,19
74:23 76:8,14 77:4
78:12,16 82:6
84:21 88:10 89:5,
14,22,23 90:11,21
92:15 93:15,16
94:13,17 97:19,21
100:14,16,17 102:4
105:6,8 110:4

yourself 72:20
87:24

Exhibits	-	17 12:5 125:23 126:2 207:12 218:22
7180 Justin White 02-10-21 Exhibit 1 4:13 21:10,11,14	--I 134:16	18 205:23 207:3,10 234:7
7180 Justin White 02-10-21 Exhibit 3 4:15 87:21,22,24,25 155:18 216:25	0	18-week 12:5
7180 Justin White 02-10-21 Exhibit 4 4:17 225:3,4,7	07:01 242:23	18th 108:4
7180 Justin White 02-10-21 Exhibit 6 4:19 22:1,2,4,5	1	19 169:22,25
7180 Justin White 02-10-21 Exhibit 9 4:21 89:8,9,11	1 21:11,14 90:8	1:21 74:24 75:1
7180 Justin White 02-10-21 Exhibit 10 4:23 98:3,4,7,8	10 98:4,7,8 113:25 225:12	1st 104:25
7180 Justin White 02-10-21 Exhibit 11 5:4 101:2,3,6 102:12	10-18 113:24,25	2
7180 Justin White 02-10-21 Exhibit 12 5:6 104:3,4,5,19	10-28 135:1	2 91:6 125:15 170:24 225:12
7180 Justin White 02-10-21 Exhibit 13 5:8 107:21,22,25	10-29 133:23,24	20 49:2 52:18 78:9 160:4 185:15 209:10, 12 220:7 244:19
7180 Justin White 02-10-21 Exhibit 14 5:10 120:12,13,15	10-29s 133:1,10 135:4 136:21	2012 18:2,3 160:20
7180 Justin White 02-10-21 Exhibit 16 5:12 125:2,3,6	10:00 142:11 143:4,9	2015 18:3 55:6,7
7180 Justin White 02-10-21 Exhibit 17-Placeholder	10:15 8:2,4	2016 18:15 19:10
7180 Justin White 02-10-21 Exhibit 19 5:16 169:21,22,25	10th 8:5	2017 15:22 18:16 19:11,21 23:13 27:19 42:23 43:11 53:10 60:1 63:7 72:12 75:3 80:9 93:6 100:8,14,17 107:7 195:25 238:4
7180 Justin White 02-10-21 Exhibit 20 5:18 209:10,11,12	11 101:3,6 102:12	2018 20:5,7 84:7 89:25 99:3,16 100:9 101:13,17 104:25 108:4 113:2 117:5 126:9 127:18 132:8,13 147:18 159:11 170:9,11,14 177:10,12 178:21 193:8 196:1 207:16,18 218:11 221:24
7180 Justin White 02-10-21 Exhibit 24 5:20 223:24,25 224:1	110 220:10	2019 211:5 223:3,5,9
7180 Justin White 02-10-21 Exhibit 25 5:22 204:18,19,20	11:00 142:12 143:10	201919100031 243:24
7180 Justin White 02-10-21 Exhibit 28 6:4 232:5,8,9	11:05 38:9,10	2021 8:5 243:22
\$	11:14 38:10,12	20th 89:25
\$19 227:22	12 12:8 89:3 104:3,5,19 116:3	21 220:10
	123 155:20	22 207:16
	12:00 138:18 140:5 142:13 147:6 180:25	22nd 147:18 167:17 170:9,11 207:15 243:22
	12:06 70:21,22	23 155:20
	12:12 70:22,24	23rd 207:15 221:23
	12:17 74:23,24	24 221:11 223:24 224:1
	13 107:22,25 217:2	24- 208:3
	131 221:10	24-hour 208:4
	13th 211:4	24th 188:13
	14 120:13,15	25 78:9,11 204:18,20
	15 100:17 160:4	
	15th 211:5	
	16 88:1 125:3,6 207:11	

25th 207:18**27** 117:5 127:18**27th** 100:8**28** 232:5,9**2:00** 138:17 140:3,4,5 141:6,7,21 143:11,
21 144:4 145:22 147:10 181:1,20**2:04** 97:24,25**2:10** 97:21,25 98:2**2:58** 124:12,23,24

3

3 87:22,25 155:18 171:1 216:25**3-17** 127:17**3-17-2018** 127:5,7,9,11**3-27** 127:17**3-27-2018** 127:10,16**30** 115:10 146:6,15**30th** 101:13 127:2**32-1** 225:9,13**39** 50:25**3:00** 188:13**3:17** 124:24 125:1

4

4 225:4,7**4-3-18** 120:23**408** 222:11**47** 88:1 155:20**4:04** 155:10,13**4:20** 165:2**4:52** 186:24,25**4th** 223:3,5,9

5

50 99:7,12**52** 217:1**5:00** 144:5 145:22**5:24** 186:25 187:2**5A** 204:24 205:1**5th** 27:9,12,15,18,19 28:7 100:9,14 211:4

6

6 22:2,5**6-8** 171:3**69** 218:7**6:35** 233:5**6:40** 233:5,7**6:45** 236:11,12**6:51** 236:12,14

7

7 100:16**78** 88:1,3**7:00** 170:16**7:01** 242:21

8

8-15-1989 10:14**82** 88:7**84** 218:22**8:00** 170:16,18**8:30** 117:19 127:25

9

9 89:9,11 127:25**911** 66:17 68:22 69:3,16,21 70:11 71:6,
12,24 72:1,6,9 93:20 109:6 111:13
115:22 134:19 135:1,9 136:19,21,25
163:21,22 164:2,3 185:2,8 222:20**9:00** 127:22 170:19**9:40** 127:5,22**9:40:52** 127:16

A

A-N-T-O-N 142:25**a.m.** 8:2,4 38:10,12 140:3,4,5 141:6,7,21
143:12,21 144:4 145:22 147:6,10 181:20**ability** 204:7 231:16 241:3,8**absent** 48:9**absenteeism** 241:11**absolutely** 74:12 102:15,21**academy** 55:11,16,18,19,23**accept** 26:14 61:14**acceptable** 26:22**accepted** 62:25**access** 199:3,7,9,11**accompanying** 245:5**accomplished** 182:17**account** 59:12**accurate** 59:12 91:13 100:21 109:17,19
123:24,25 124:1 130:18,21 131:4 139:10
205:19 206:18 207:20 243:14 244:8**accused** 164:17**achieving** 13:8**acknowledge** 8:10,13**act** 157:1 195:20**acted** 50:12 149:24**acting** 15:1 62:13 151:11 152:9 154:14**action** 76:23 96:23 99:8 123:19 243:18**actions** 99:21 152:24 198:5 219:18
225:22,25 226:3**active** 137:3**activity** 154:5 176:25 177:18 178:10
181:16 215:7 238:7**actual** 153:15,23**Adam** 54:6**adamant** 153:12 181:18 182:20 184:6**add** 122:8 214:20 226:3,5**addendum** 244:10 245:1

additional 123:21 143:20,22 Additionally 226:4 address 43:15 83:25 106:18 addressed 36:17 addressing 43:5 adhered 183:19 adjacent 199:1 adjourned 242:24 administered 8:14 administration 12:14 13:1 admission 98:23 admit 129:17 admitted 40:15 47:4 66:6,7 76:19 104:8 admitting 141:5 advanced 39:4 advice 102:22 230:9,15 advise 102:20 advised 102:15 105:8,21 112:15 affairs 207:24 208:2 214:12 228:1 231:12 234:12 affected 204:6 affiliated 126:18 aforementioned 243:8 244:6 African-american 43:12 46:20 54:17 140:21,25 194:1 195:23 239:19 African-americans 192:7 aftercare 170:3 afternoon 141:25 142:7 144:19 afterward 128:15 agency 12:8 160:21 166:21 213:3 216:10 aggression 15:5 169:2,3 aggressive 15:9 150:24 153:1 164:21 214:1 228:5 aggressively 154:15 aggressiveness 169:3,10 agree 9:1 58:9,24 78:11,14 87:12 90:4 144:10	agreed 107:16 agreement 8:21,22 179:19 180:12 232:13,14,20 agrees 84:14 ahead 64:7,8,10 81:9 110:12 119:25 121:19 129:4 141:18 159:5 211:19 air 61:13 Albemarle 55:5 Alexander 32:9 47:24 48:20 49:10,15 51:16 52:4,7,14,21 53:2,5,13,19 61:1,11 63:3,4,8,18 64:24 66:14 69:1,14 75:22 76:18 77:1 85:12 86:5 92:12,19 93:2,7 108:4 111:25 112:7,16 114:7,22 115:13, 15 116:2,19,20 122:17 218:9,19 241:7,18 Alexander's 60:25 72:10 75:4 77:12 109:11 240:14 Alexander's 76:2 Algretta 58:13 allegation 155:22 197:11 213:24 217:1, 2 218:7,22 234:15 allegations 58:16 98:16 163:11 196:23 197:1 207:23,24 216:13,24 alleged 35:24 37:4 64:18 67:18 133:4,7 149:5 177:16 204:12 208:19 allegedly 37:6 39:21 43:5 60:22 70:7 108:9 113:15 123:20 179:23 195:24 241:23 allowed 13:21 226:10 allowing 209:6 210:1 219:19,20 alluded 147:23 aloud 90:3 amended 21:17 87:25 155:19 216:25 225:7 226:4 245:8 Amendment 175:17 amount 14:16,19 139:11 160:3 and/or 245:5 Andre 54:7,25 104:8,18 108:15 111:1 Andrew 242:7 ankles 163:1 164:20 announce 146:17 another's 56:21	answering 34:23 37:2 73:7 206:9 answers 10:2 Anton 142:21,24,25 Antwon 142:24 anymore 58:11 64:7 91:9 anyone's 39:5 88:17 anytime 159:14,15 anywise 243:16 apartment 138:20 apologized 238:15 239:5 Apparent 171:1 appeal 84:9,10 133:5 222:8,17 appealed 197:9,15 222:9 appearance 145:3,8 appeared 243:6 244:18 appears 78:24 88:1 101:12 125:14 128:14 129:6 130:1 170:3 211:4 224:10 applicant 213:4 application 24:19,22 26:5 99:7 229:19 applied 23:12,14 24:10 85:24 151:3 214:24 227:17 233:21 apply 23:9,10 212:4,6 approach 50:23 108:23 133:15 approached 33:17 109:1 approve 63:25 64:2 68:1,4 approved 26:22 84:2,5,12 123:20 168:11 approves 84:10 237:15 approximate 138:16 193:9 approximately 12:5 15:22 20:5 32:15 42:21 60:2 73:3 99:6 127:25 160:8 170:19 175:23 177:12 207:9 239:13 April 23:13 84:7 87:11 196:1 area 31:12 139:8 171:4 Argretta 39:2,18 98:22 102:5 148:16 Argretta's 101:19 102:9 argument 108:6,8,10 144:7 225:11,18 arguments 74:17,18
---	--	--

arm 13:17 151:2,3 153:3,4 155:7 158:11
161:18 162:3,11,12,14,17,21,23 166:2,7,
18,20 167:9,19,24 168:2,6,10,12,20,23,
24,25 169:6,16,17,18,19 170:25 183:15
214:2,3 216:21 228:5

arms 163:1 164:19

arrangement 8:19

arrest 52:9 141:21,22,24 143:15 149:22
151:19 152:12,25 153:8,19,22 157:13
162:21 163:14 164:22 168:10 184:3
214:2

arrestable 237:7

arrested 94:10 138:5,7 237:4

arresting 156:24

arrests 100:18

arrive 139:16

arrived 148:21 165:10,13,15 167:2

asks 205:16,21

aspects 13:4

ass 88:25 89:2,4 93:10 111:9 140:18
148:6

assault 88:10 108:18

assaulted 88:9 155:7 213:25

assaultive 15:10 150:24 153:2 164:21

assessment 239:24

assign 52:23

assigned 18:5 53:3 54:1 106:20 154:7
183:25

assist 10:3

assistance 37:1 163:5,6,7

assistant 66:18 69:6 99:19

assistants 199:9

ASSOCIATES 243:23

assume 206:13 212:6

assure 66:1

assured 228:11

asterisked 39:19

Atherton 242:8

attached 135:5 244:10,12

attacked 153:1 155:6 167:12 169:7
214:1

attacking 156:20 157:9 164:22

attempt 17:9 128:10 129:6 229:25

attempted 17:11 133:15 182:6

attempts 186:18 209:4

attended 27:5

attention 21:14 125:6 148:12,14,15
223:24 225:8

attorney 9:4 10:20 230:8,15,16 242:7

attorney-client 20:9 179:6,9 226:8
230:25

attorneys 8:9 20:12,15 21:2 145:7
200:9 227:11 230:8,14 233:18

August 55:6 223:3,5,8

authority 78:15,21 79:3,6 174:12,14

authorization 209:21 211:21 212:18

authorized 211:12

avoided 183:17,21,25 184:6

aware 17:4,5,16 78:3,5,7 81:12 82:22
172:25 174:4 205:21 206:10

awhile 94:15 126:22

B

B&e 131:25

B&es 131:12 132:1

B91 206:7

B9i 206:7

back 22:17 24:22 26:22 33:8 34:5 38:11
41:9 42:9 44:19 46:19 48:10 51:8 55:6
63:5 67:22 68:2,4 70:23 74:25 76:24
80:22 85:16 90:9,12,14 92:2 96:3,19
97:20 98:1,12 102:12 111:20,21 112:1,5,
6 113:20 122:3,4 124:25 126:22 133:13
135:6 137:14,25 139:23,24 141:19 145:9
151:7 152:17 155:12 162:17,25 164:19
170:17 171:19 172:18 173:5 178:6 182:4
185:2 187:1 192:14 198:20 220:25 221:1
222:15 233:6 234:21 236:13 239:23
241:5

back-and-forth 57:4

backed 48:19 117:16 118:4 119:12
122:5,6 130:8 131:5

background 11:3

backing 61:6 118:14 119:4,7,24

backup 36:24 139:19,20,22 140:10,16
141:1,2 148:8,9 163:5 164:10,11,17
183:5

backwards 93:10

bad 92:5 105:11,16 114:15 166:8 198:18
227:14

badge 189:5 190:8

badger 146:8

badgering 145:13 146:13

bar 56:20 151:2 153:4 155:7 158:11
161:18 162:3,21,23 167:19 168:24 214:2,
3

barely 40:15,16

Bartholomew 231:5,7,8

base 14:25 40:20

baseball 199:24

based 14:22,23 39:10 43:5 51:18 52:12,
15 60:17,18,19 61:24 65:7 74:15 75:19
77:17 78:11 82:12 101:25 106:7 124:5
128:19 130:1,6,9 131:3 143:19 144:11,23
150:20 174:15 186:9 208:17,19 214:7
228:4 239:20 241:7

basic 11:25 12:6 13:9 55:4 60:8 158:6
161:20

basically 14:11 36:6 114:10 164:18
194:24 204:14

basing 40:22

basis 29:7 42:16 43:6

bat 92:1

bathroom 70:16

baton 13:20

bears 169:20

beef 61:12

began 27:13 114:7,9,11 118:24

begged 99:1

begin 9:20

behalf 154:21 191:11
behavior 239:21
behaviors 195:6 239:21
belief 36:25 39:22 40:21 130:9,10,11 184:14 244:7
believed 137:1 185:9
believes 222:22
belt 85:3
bender 42:5,20 117:8
benefits 39:7,8 41:5 58:14 77:20
Bertie 18:5 161:15
big 76:4 86:21 91:15 96:21 110:5 123:18 124:6
bigger 104:22
bills 46:15
Bin 194:19
birth 10:13 154:11
bit 22:4 93:1 104:22 108:1 147:13 225:16 237:21
black 28:15,17 42:7 87:15 91:8,15 110:5 140:20 191:4 192:7 217:23 239:15
blacks 217:6
blank 202:18
blaring 165:15
BLET 12:7 13:3 15:12 48:6 55:11 56:2, 5,8 60:8,14 64:23 158:6 161:20 233:23
block 204:25
blocked 226:19
blue 129:12 135:13
bluish-gray 28:17
Bo 140:18 156:5
board 24:16 25:14,23 26:9 29:24
Bobby 191:24 192:2 193:12 194:4 220:20 221:2,15 223:23 235:1 238:13
bodily 108:22
bond 9:22 150:20 168:18
bone 167:24 170:25 171:1,2,8,11
book 44:21,22,24,25 45:1,3,14 46:24 47:2,3,5,6,7,12,14,15,19 51:12,13,21

79:25 80:4,6 83:17 86:6 90:13 103:15,19, 25
books 51:25
boom 115:7
boom' 115:7
bordered 116:5
born 12:20
bother 172:13
bottom 65:11 123:9
boxes 234:6
boy 221:17,18
brakes 118:22
Brame 226:2,9
break 10:9 70:16 97:14 115:5 123:2 124:9 125:13 168:6,9 169:15 233:2
breaking 131:8,21 144:9
Brian 8:25 9:20 26:1 32:18 34:20,22 35:9 36:2,19 37:1 70:15 101:13 104:7 210:4 233:12 235:25
briefly 17:23 42:8 48:1 77:8 149:7
bring 14:2 21:13 86:5 100:7 112:4 148:12
Bro 221:1
broad 132:11
broadcasting 128:25
Broadwick 93:4
broke 114:8 163:2 164:19 167:10 168:23,24 169:6,16,20 214:3 216:20
broken 164:20 166:2,7,20,23 167:21 168:13,20,22,25 171:2,4,8,11 183:15 228:5
brought 42:17 107:14 148:14,15
brutality 164:18
Bryan 34:21 227:19 229:20,24 233:9,15
building 25:1
buildings 46:15 49:22
Bullock 24:11,12 25:13,15,25 26:16 27:23 28:2,3 29:12,20 31:2 33:4,16 35:3 57:23 59:17 64:15 68:17,20 96:18 101:23 104:10 133:2,3 135:7 136:20 137:16

148:16 177:3 178:12,13,14,15 179:24 180:2,3 181:3 185:3 188:7,19,25 189:1,4 190:4,16,17 195:17,19 196:10,22 197:4,5 198:2,5,20 216:19 222:3,6,20 223:7,11

Bullock's 149:5

burglaries 132:1

Burns 53:17

Burrell 117:2,4

business 90:11

businesses 42:14 46:15

busy 103:3,9

buzz 24:25

C

C.M. 195:24

calculation 119:1

call 10:12 25:12 48:8 50:20,23 68:13 69:4 71:12,24 72:1 85:10,15,25 88:14 92:7 95:23 110:18,21 116:2,14 131:21,22 150:5 151:9 156:7,10,13,21 163:3 165:19 171:20 173:11 175:3 176:2 185:24 186:19 200:7,9,25 201:8,9,20,25 202:22 206:24 216:15 218:4 223:16,21 229:12, 14

called 26:16 27:20,22,23,24 62:7 77:4 86:5,7 88:8 93:20 107:17 108:14 110:14 114:13,14,18,19 115:1 116:18,20 131:18 154:6 164:7,8 165:4 176:4 179:21 185:10 186:7,9,15 188:15 194:18 200:11,16,21 201:22,23 214:4 218:2 223:22 224:13,17 228:14 229:13

calling 36:23 49:23 73:8 95:18 114:12 156:19 163:5,6 169:12 176:5 187:10 200:8 223:19

calls 34:23,24 36:16 37:2 48:2,4,9 57:6, 7,8 61:6 113:24 132:1 178:25 239:14 241:13,14

calm 14:1 168:17 217:5

camera 97:17 117:24,25 118:6

Cameron 197:8

Campbell 32:13,16,19,23 33:3 34:8,13 35:2,5,11 36:1,3,5,6 41:15,21,22 49:19 50:1,6 52:13,21 53:4,6,7 54:5,6 60:4,5,14 61:2,13 62:7,11,12,16 63:5,11,21 64:6,

<p>20,21 65:1,6 67:7 68:8,9 82:7,11 84:11 88:8 89:21 91:18 92:20,21,22,23 93:8,13, 15 94:7 95:4 108:10,14,16,22 109:25 110:18,21 111:2,8,17 112:16,22 113:16 115:11 123:19 175:24 182:4 185:13 197:24 202:10 217:20,22,24 239:11 241:19 242:1</p> <p>Campbell's 53:4 54:3 84:3 113:15 217:5 219:12</p> <p>campus 18:14 19:2,11</p> <p>can't 22:25</p> <p>cap 199:24,25</p> <p>capability 154:1</p> <p>Capella 12:14</p> <p>captain 24:11,12 25:13,15 26:16 27:23 28:2,3 29:11,20 31:2 33:3,16 35:4 57:23 58:5,6,8,22,23 59:16 63:22 64:14 66:25 67:4,10,21 114:12,13,18,19,20 115:1,8 133:2 148:16 149:5 172:21,23 173:11,22, 24 174:2,6,15,19,22 179:23 180:2,4 181:3 187:6,8,17 188:1,7,14,25 189:1,4 190:4,16 216:19 220:21,25 222:20 227:18,19 229:24 234:20 235:18</p> <p>captains 51:24</p> <p>car 44:15 45:21 50:24 51:2,7 59:22 73:20 86:24 108:13 110:15,25 111:19,23 112:14 117:14,15,16 118:1,2,4,15,23 119:3,4,7,17,18,20,21,24 121:8 129:12, 19 134:15 135:17 152:4,7 154:25 155:1, 15,17 166:5 182:12 190:10 200:24</p> <p>care 18:11 93:17 115:4</p> <p>career 15:20 178:4</p> <p>careful 220:3</p> <p>Carolina 10:17 11:6,11,12 18:1 20:1 55:6 135:1 203:19 212:3 243:4</p> <p>carry 202:6</p> <p>cars 46:13 48:13,14,16,24 49:1 50:7,13, 19 96:2,12,15,22 102:25 122:2</p> <p>case 9:21 19:25 20:18 81:24 120:1 138:4 145:3,8 175:7 226:2,11 230:17 231:1,6, 11</p> <p>cases 143:17</p> <p>Castro 8:25 9:19,21 21:13 32:1 38:1,5,7, 13,22 70:17,25 71:3,4,15,17,22 72:4,5 74:20 75:2 87:24 97:13,20 98:6 101:5,10,</p>	<p>11 123:1,3,5 124:9,13,20 125:5 126:4,6, 8,12,20,25 128:2,5,6 129:22,24 145:2,6, 10,15,17,25 146:5,10,14,17 155:8,14 165:1,3 169:24 171:16,18 186:22 187:3 204:17,22 209:1,3,14 210:6,8 224:3,5 225:15,17 226:12,15,17 233:1,8 236:3,9 242:18</p> <p>Caucasian 137:6</p> <p>Caucasian-american 194:2</p> <p>Caucasian-americans 220:3 239:22</p> <p>caused 85:4 157:23 184:8 204:3 225:24</p> <p>caution 133:20</p> <p>cease 96:4,6</p> <p>ceased 97:10</p> <p>cell 73:5</p> <p>center 48:12 85:4 86:23 164:4</p> <p>centered 13:8</p> <p>Central 43:19</p> <p>certificate 12:1,7</p> <p>certificates 12:4</p> <p>certification 11:24 12:2,10 204:8 214:23 234:1 243:1 244:1</p> <p>certifications 12:4 45:13</p> <p>certified 48:21,23 54:6,7 61:20 62:2 63:2 75:14 103:25 157:16 208:2 214:20 233:24</p> <p>certify 243:5 244:3,17</p> <p>cetera 12:23 30:8,25 37:3 40:10 42:14 44:7 45:24 46:16 56:15 61:8 82:21 167:12 182:7 192:15 194:21 198:19 214:1 227:23 228:6,11 235:20</p> <p>chain 18:23 19:16</p> <p>challenge 41:5</p> <p>challenged 58:13</p> <p>chance 224:5</p> <p>chances 208:14</p> <p>change 67:11 77:12,15,17,18 79:2 179:13 237:21 240:5,8,9,10,12 241:1,2</p> <p>change/correction 245:6</p> <p>changed 77:17 79:5</p>	<p>changes/corrections 244:11</p> <p>CHAPLIN 243:23</p> <p>Chapter 49:2 52:18 185:15 220:7</p> <p>characterization 124:16</p> <p>charge 42:9 44:19 45:2,5,16,23 220:14 236:22,23,24</p> <p>charged 42:10 44:18 46:5 184:16,22 226:21</p> <p>charges 23:22 26:25 45:20 52:8 184:18 196:20 215:1 237:6</p> <p>Charlotte 10:17 57:16</p> <p>chase 50:8,9</p> <p>check 49:22 119:11 205:18 208:20</p> <p>checked 136:18 137:11 234:6</p> <p>checking 42:14 46:15 100:16 207:22</p> <p>chemical 13:19 158:7</p> <p>chief 23:2,7 24:21 25:4,5,6,8,9 33:4 35:3 51:24 63:12,13,17,19,25 64:12 84:12 90:4 96:18 101:23 104:10 166:21 167:20 178:14,15 180:3 196:10,14,22 197:4,5 198:1 229:7,11,15 235:22</p> <p>child 104:12 109:16 110:4 184:2</p> <p>choice 212:10</p> <p>chosen 225:23</p> <p>Chris 68:6 120:22 148:4 191:25</p> <p>circumstance 102:16</p> <p>circumstances 14:23 36:12 183:14</p> <p>citation 51:12 86:5 90:13 103:14,19</p> <p>citations 82:1,2 83:8 218:24 219:1,10, 13,16</p> <p>cite 79:25 80:6</p> <p>citizen 14:25 15:4 42:5,6</p> <p>citizens 13:11 81:8,10,12</p> <p>Citizens' 113:9</p> <p>city 50:9 55:6 96:21 102:25 105:23 106:2,7</p> <p>Civil 146:6,15</p> <p>claimed 90:20 137:15,16</p> <p>claiming 83:17 166:1</p>
---	--	--

clarify 38:19 clarities 38:21 class 55:24 classes 55:9 classmates 55:15 clean 199:13 clear 27:11 95:22 103:5,11 156:13 157:9 174:19 176:15,17 194:3 198:8 242:11 cleared 69:14 70:4 112:5 169:17 206:15 218:20 clerk 27:13 80:22 clerk's 237:19 client 113:20 122:25 163:17 181:14 184:13,14 198:10,13 204:11 206:4 208:10 230:25 close 139:1 188:25 closed 188:21 closely 51:3,5 closer 105:6 112:12 116:2,3,6 club 56:20 co-workers 55:14,15 74:8 coaching 123:17 146:11,12 code 113:25 Cody 53:17 colleagues 187:14,17,18,20 collection 209:14 collectively 77:8 college 11:7,12,16 18:14 55:5 collision 42:5 117:6 120:24 125:13 127:6 128:7 130:23 collisions 85:5 color 28:17 202:15,17 combined 196:19 command 13:18,25 175:6 180:6 221:3 comment 209:16 217:9 commentary 146:1 commented 217:4 comments 155:11 194:16	commission 39:19 41:4 205:18 209:6 244:25 commit 30:7 31:2 137:21 committed 185:19 220:6 committee 173:3 174:7,10,13,18 committing 134:3 137:21 common 142:6 communicating 61:8 communication 187:13 communications 20:9,13 111:13 179:7,10 community-oriented 133:14 185:22 company 212:1,2 compensation 39:9 240:10 competently 10:25 complain 81:8,10 complained 42:4 69:3,19 70:1,4 83:22, 23 196:9 complaining 46:5 81:13 113:8 162:25 164:13 167:9 179:25 complaint 43:11,13 66:16 68:22 70:10 71:7 72:6,8,9 82:22 87:25 113:7,9 155:19 182:25 216:25 225:8,20 226:4 237:23,25 239:4 complaints 23:21 39:24 43:4 65:12 82:21 176:24,25 177:9,13,23 178:5 181:16 194:25 198:11 201:14 208:25 220:13,16 221:12 237:22 238:4 239:8,10 241:21 complete 119:10 162:3 243:14 244:8 completed 80:24 complex 138:20 compliance 14:4 158:8 169:11 complied 154:20 183:17 complies 108:2 125:9 170:2 217:3 225:19 232:11 comply 107:16 150:14 153:20 154:23 157:1,5 composed 192:12 concern 17:21 86:17,19	concerned 176:12,18,19 180:15 conclude 225:6 concludes 242:20 conclusion 231:4 conduct 66:10 86:14 115:18 181:14 183:22 218:17 239:20 conducting 100:19 conference 8:15 220:14,18 243:7,13 confidence 208:21 confirmation 116:24 confirmed 207:24 218:19 220:19 228:14 connection 37:8 94:19 consecutively 243:13 consent 8:18 9:14 consequences 134:12 considered 45:18 consisted 13:17 39:1 consistent 108:20 239:25 consists 22:5 98:9 211:15 constantly 114:5 241:11 constitute 232:20 construed 45:18 contact 28:4 56:3,4,8 57:11 134:13,14 186:20 contacted 22:23 25:14 27:8 171:21 172:21,22,24 227:9 contend 67:16,17 225:2 contending 180:16 181:6,8 contents 244:4 contested 40:17 41:2 context 192:1,11 continue 65:3,21,23 86:14 101:21 109:14,23 129:3 131:16 continued 136:4 225:21,25 continuum 13:16 158:6 contract 27:21 28:9,10,13,14,15,24 29:5,8,18 30:23 31:1,4,21 33:25 232:16, 18,20,23
--	---	---

contracts 31:13
control 14:3 18:11 162:14,15 168:11
conversation 63:9 91:23 92:8 105:12 106:3
conversational 152:1
conversations 26:3 55:17 73:10 74:14 149:19 180:22
convicted 184:17,23
convictions 184:16
cool 217:5
cooperate 149:24,25 150:2,14,23
cooperated 149:9 150:18
cooperation 15:6 150:21
cooperative 152:8,21
copies 101:24 213:7
copy 31:4,6,8,21 96:11 99:5 102:3 163:20,24 173:13,14,15
correct 60:1 72:7 75:3 100:23 123:6,9 125:17 185:18 223:14
correctional 18:6 160:1,11 161:15
corrections 18:8 159:18,22,24 160:1,9, 22 245:5
corrective 99:8 123:19
correctly 110:17 171:5
coughing 233:12
coughs 234:3 239:16
could've 106:25 139:5 154:3 216:9
couldn't 76:4 114:3
counsel 8:18 21:16 146:1,3 243:18
counseling 99:20 100:10 123:17 175:22
Counselor 41:8 65:11 87:20 110:12 171:25 182:4 185:1 215:25 218:6
count 128:16
counties 116:5
county 8:7 11:5 15:21 16:15 17:6 19:21 22:19,24 27:13 28:21 29:12,17 30:8,15, 17 31:19 32:3,10,22 37:14,15,16,17 38:15,17 39:3,4,11,12,16,17 41:3,17 49:6 50:4,9,17 54:24 57:16,21 84:24 85:15 86:11,12 98:15,19 100:13 102:10,25

105:11,16,25 116:1 117:3 131:9 153:22 175:13 179:20 180:10 184:1 201:11 202:5 203:20 204:3 207:12 210:20 211:2, 7,10 212:21,24 213:11 214:25 215:14 216:6,13 222:9,10 224:24 227:3,9,13,25 228:11,12,15,17 229:17 230:2,10,19 231:9,10,13,24 233:21 235:15 242:8 243:4 244:16
County's 175:19 242:7
couple 60:10 85:20 233:8 236:17
court 8:3 9:2,5,9,13 10:4,11 21:14 27:13 38:8,11 70:20,23 74:22,25 97:23 98:1 124:11,22,25 126:4 127:1 155:9,12 186:23 187:1 215:10 226:9 233:3,6 236:10,13 237:13,15 242:20
courthouse 188:17
cover 42:16 173:19
covered 43:6 161:10 194:24 198:3
covers 231:15
crash 86:23
crazy 48:12
cream 73:15
create 232:16,18
created 220:12
creates 175:13
credentials 189:5 190:8
credibility 231:19
crime 105:25 142:2 185:15,16
criminal 11:15,21 12:19,20 45:3 46:1,8 80:9,11,13,16 81:21 82:19 83:16 90:12, 23 91:5 96:16 109:4 110:16,19,21,23 111:4 184:3,15 203:19 205:17 218:24,25 219:10,13,15 231:9 236:19,22,23,25 237:5,7,9 238:13
criminology 11:15
crossing 85:2
crying 114:8 151:21 166:19
cuff 43:25
curate 143:17
current 10:15
curriculum 161:11,13,22

curse 91:21 142:23
cursing 82:15 88:11 91:18
Curtis 226:2
custodian 163:22,23 164:1
custodians 199:12
custody 18:11 163:16,19 166:11 184:4 237:3
cut 85:8

D

D-U-V-A- 192:12
dad 94:2
damage 44:15 45:21
damn 88:25 111:9 112:16 156:6
danger 85:1 87:2 157:25
dark 87:16 157:24
database 143:18
date 8:4 10:13 20:4 21:21 27:7,9,19 28:7 90:1 100:8 127:12 132:20,22 154:11 160:18 193:7 206:25 207:6,17 211:3 230:12,21,23
dated 101:13 104:24 108:4 120:23
dates 100:11 177:8
daughter 43:13 44:6,8
daughter's 43:18
daughter's 44:11
day 24:24 29:24 59:18 73:12 85:13,19,20 86:1 121:17 122:9,23 141:24 142:8 144:18,19 170:15 180:11,16 181:4 228:10 240:17,20,24 243:22 244:19
day-to-day 18:9,24
days 32:9 33:15 61:18 73:13 85:21,23 113:1 229:13
de 14:11,14
de-escalate 154:15,18 168:16
de-escalation 13:18,23,24 14:17,20 158:20
deal 86:21 89:3 123:18 124:6 156:16 160:17

dealing 15:1,4 99:9
Dec 100:17
December 42:23 43:11 55:7 63:7 80:9 93:6 160:20 170:9,10
deception 43:22 68:8,11 163:11
deceptive 65:7 66:4 68:12 108:11 175:25 197:23 198:12 224:23
decide 173:24 230:9
decided 50:15 183:7 239:8
deciding 208:3
decision 14:22 35:5 58:10,24 133:6 174:1 214:10 229:16
decisions 78:15,18
declare 8:15
declines 237:14
decreased 107:18
deep 216:1
Defendant 22:6
Defendants 9:21 225:21 226:1,17
define 56:13 86:18 119:5
degree 12:11,16,25
degrees 44:22 45:12
delay 118:8,10 128:19,22,23 129:5 138:8
deliver 24:19,23
demonstrate 161:23 162:1
demotion 77:22
denied 61:15 102:1 148:11 201:13
dental 39:8
deny 120:8
department 13:21 16:24,25 17:14 18:2 20:2 30:19 39:5 50:3 98:19 160:13 177:19 214:13 216:9 234:17
department-issued 13:22 18:23
departments 235:14
depend 36:12
depending 240:24
deposed 9:24 19:22,23
deposition 8:6 9:23 10:10 20:3,11,17

21:10,16,17,18,25 22:1 87:21 89:8 98:3 101:2 104:4 107:21 120:12 125:2 126:1 146:1 151:16 169:21 204:19 209:11 223:25 225:3 232:8 236:5 242:21,24
deputies 16:23 48:16 53:12 56:18 57:8 60:9,13 64:23 67:18 78:15 92:4 93:13,16 106:11 122:5 141:9 142:14 158:24 160:24 190:23 220:2,15 221:2,3 231:22 242:12
deputy 13:7 23:2,7 25:4,5,9 31:19 32:18,22 33:4 34:19,20,21,25 35:2,7,8,9 36:2,10,13,14 37:1,6,22 45:12 51:24 53:8,14,15,17 54:6,7,12,13,17,18 57:25 61:3 62:1,4,5,10 63:2,4,12,13,17,19,25 64:12,25 66:12 70:6 73:5 76:2 77:1 84:13 90:4 93:2,17 94:23 96:15 100:17 101:12 102:13 103:2,4,13,14 104:7,8,10,18 105:7,21,24 106:11,18,22,23,24 107:16, 18 108:15 109:15 110:13 111:1 112:15 115:16 120:25 121:16,18 122:9,23 140:21,25 142:20,21,22 143:2 144:1 146:18 147:2 175:7 180:10 182:5 183:13, 25 184:9 188:3,4 190:23 191:1,6,8,12 194:17 195:23 196:4,6,10,14,24 199:6 205:1 217:4,15 218:15 220:22 221:12 223:14 224:11,15,25 229:6,11,15 233:22 235:22 237:8,12 239:23
describe 13:15 28:12 76:6 88:9 91:14 138:19 149:2 152:2,24 160:25 162:2 199:16 202:12 204:23 218:11 233:16
describing 64:13 151:20
deserve 219:5 220:9
deserved 196:18
designed 158:2,19
designee 28:21
desk 106:13 109:3 178:2
detail 35:14 59:24 68:23 71:5 76:6 235:18
details 161:12 165:4,7
Detective 231:8,9
determine 15:4,7 80:18 237:13
determined 196:25 219:4
Deval 192:12
development 138:20
device 149:14 161:6

diagnosed 168:1
Dickinson 9:22
didn't 61:22 76:18 163:8 190:7
difference 34:14 35:12,16 49:11 57:17
differences 35:13
dinner 56:14 57:14
directed 111:5 124:19 221:5
directing 156:22 192:16
directions 34:24 37:3 162:4
directly 46:4 61:1 73:18 82:14 167:13 195:15 198:8,21
director 28:20 39:17 66:18 69:6 166:19 167:21 238:7 241:25
dirty 92:7,17,21,24,25 93:9,11 94:16
disable 158:2
disagreeing 122:21
disagreement 113:22
discharging 13:22
disciplinary 76:23 99:9,21,25 100:3
discipline 196:23,24
disciplined 196:17
disclose 23:15 213:17 215:1,6,13
disclosed 23:18,20,25 24:2,3,5 126:21 213:17,19
disclosing 179:6,9
disclosures 126:14,21
discovery 126:14,17
discretion 47:16,18
discretionary 78:20
discrimination 58:19,21 177:17 216:5 221:13 237:22,24,25
discriminatorily 195:20
discriminatory 190:19 191:17 194:14 195:3,6,20 198:5,22 219:22 225:21
discuss 23:6 47:24 49:10 59:23 65:24 148:20 230:20
discussed 33:8 49:14 127:6 172:2
discussing 34:5 38:13 125:13 128:7 200:8 230:7,15

discussion 43:8,9 111:16 136:16
discussions 42:25 65:10
dismissal 59:18 208:24
dismissed 24:7
disobey 79:11
disorientation 222:23
dispatch 50:21 71:7 72:9 109:6 165:3
dispatcher 69:3,16,21 70:3 72:7
 134:19,21 135:9 137:1,7 185:2,8
dispute 115:12,14,21,23 171:12
disputes 74:2,3,16,18
disputing 127:13 129:8,11,13
disrespect 192:10 193:23
disrespectful 90:15 109:16 110:3
 112:23 136:7,8 194:21
disrespecting 113:16
distanced 9:2
distinction 136:24 137:19 185:7 222:23
 236:18
distinguish 231:17
distorted 76:12 90:21 91:11 109:18
 111:7 121:22 140:8,14
distortion 133:9 135:9 136:25 137:19
 185:7
distress 204:4 225:25
distributive 12:23
DMV-349 125:10
doc 209:15
doctoral 12:13,24
doctors 172:3
document 21:19 22:8,9,12 28:22 39:20
 89:15,18,19 90:7 98:10,13,14,18,20,21,
 25 99:4,11 101:6,9,11,14,15,16,22,25
 104:21 105:4 108:5 115:22 120:18,21,22
 123:9 125:25 170:1 171:7,13,17 206:9
 207:17 209:19 210:5,7,25 211:3,18,20
 224:7 225:9,10,12 244:21
documentation 39:8 100:3,25 123:22
 185:14 216:16
documents 20:14,15,16,18,21 31:10
 38:16 39:10,15 40:19 41:11 99:25

101:23,25 102:1 123:23,25 209:7
domestic 93:23 94:10
Donald 53:9 54:11 92:19
don't 50:23 62:23 142:12 146:8 179:5
 194:1 221:17
door 61:22 111:24 115:9,12 146:23
 147:10,11 148:24,25 149:10,13,20 152:3
 182:10,13 188:21,24 189:3
doors 92:16 146:22 152:15
double-wide 138:24 139:7
downgrade 77:24
downgrading 165:19
downs 14:10,14
draft 80:11 237:9
dramatically 97:10 107:18
dressed 25:2 27:10
drew 210:18
drive 189:23
driver 119:14
drives 137:8
driveway 148:23 182:12
driving 85:4 86:23 87:15 117:14
drop 176:24 177:13,14,15,22,24,25
 178:1,3,4,5 208:25
dropped 116:11
drove 116:11
drug 26:17
dude 46:7
due 175:16
duly 9:16
dumb 194:3
Durham 211:1,7
Durwood 32:13 41:22 63:21 197:24
duties 18:9 77:15,16 136:5
duty 57:9 85:12 202:7

E

e-mail 125:25
e-mails 178:25
earlier 108:20 110:14,20 117:11 162:10
 194:7,8 217:13 218:13 222:20
early 42:14 141:23 142:1 144:7,20
 179:24 195:25
ease 105:8 106:8
education 27:2 162:20 163:13
Edwards 142:21,22 143:2 144:1 165:18
 188:5
EEO 178:10 198:10 208:25 238:2 242:7
EEO-PROTECTED 238:6
EEOC 23:21 194:25 215:1 220:13 238:8
effect 26:7 34:14 46:12 48:1 77:19 87:18
 91:12 105:14 106:6 109:25 110:23
 115:18 121:3 135:23 148:7 150:8,10,11
 162:21 163:14 166:1,23 169:9 189:8
 191:4 193:16 222:22,25 242:10
effectively 206:5
effects 76:9
egregious 102:17 239:20
elaborate 12:18 35:15
elected 178:1
electronic 118:8 128:24
Elizabeth 55:6
else's 133:21
emergency 113:24,25 114:1 116:1,10
 121:1,7 163:21 164:2,3
emotional 114:10,11 204:4,16 225:25
employed 175:3 207:7,11 216:7
employee 37:21 41:18 100:10,11 123:16
 175:22 199:10 227:23
employer 212:23 213:4,5,6 215:2,8
 229:22
employers 213:9 226:25 227:10,14
employment 15:20 17:24 19:9,18 22:18
 26:12 27:21 28:8,10 29:5 32:2 33:25
 57:21 100:11 126:19 131:9 160:6 174:24

<p>187:5 203:4 204:3 205:25 206:20 208:13 209:4,7 212:9,16 214:20,24 215:20 225:23 226:18 232:16,18 233:11,17 235:12</p> <p>EMS 164:11 166:19,21,24 167:21</p> <p>encounter 132:17,18</p> <p>encouraged 23:9</p> <p>end 91:7 107:15 113:23 116:16 221:13, 17 224:14</p> <p>ended 24:16 33:24 94:14 108:20 179:23</p> <p>enforce 79:15,17 80:6 83:19</p> <p>enforcement 11:18,24 12:1,2,6,9 13:6, 8 36:8 42:13 43:8 46:9,10,17 49:10,13 50:11 55:4,16 60:8 77:16 78:12,24 79:7, 21 95:1,5 96:5,7 97:10,12 143:20 147:5 158:6 159:19 160:23 161:20 168:16 182:3,18 203:19 204:7,8,11,15 212:7 216:8,9 230:1 236:24 237:17</p> <p>enforcing 203:13</p> <p>enhance 169:11</p> <p>ensure 172:19</p> <p>ensuring 13:7,10</p> <p>entered 145:2,7</p> <p>entering 131:8,22</p> <p>entire 15:20 19:2 32:10 100:4 129:14</p> <p>entity 175:18</p> <p>entrance 109:2</p> <p>epithets 191:22</p> <p>equal 175:17</p> <p>equipment 15:24 16:1,2,5,9,12 18:17 19:14 121:7 200:5</p> <p>equivalent 171:11</p> <p>Eric 54:18,19</p> <p>escalated 154:22</p> <p>escalation 14:2</p> <p>escort 14:9</p> <p>escorting 151:24</p> <p>essentially 65:5</p> <p>estimate 73:1 139:11,12,15</p> <p>et al 8:8</p>	<p>evaluation 100:6</p> <p>evaluations 99:10 198:19</p> <p>Evan 131:15</p> <p>Evans 131:9,22,25</p> <p>evening 144:20</p> <p>event 103:20 127:17,22</p> <p>event(s) 243:19</p> <p>events 178:16 181:7,8</p> <p>eventually 26:11 241:24</p> <p>evidence 39:18 71:13 118:7 122:25 132:3 135:8 162:19</p> <p>evidently 61:12 68:25 151:6 235:17</p> <p>exact 202:17</p> <p>examination 9:18 236:15 245:3</p> <p>examined 166:2,5,9,22 244:4</p> <p>examines 21:19 22:9 89:15 98:10 104:21 105:4 108:4 120:18 210:7 211:18 224:7</p> <p>examples 50:14 217:19</p> <p>exceeds 226:11</p> <p>excerpt 88:5</p> <p>excess 206:6</p> <p>excessive 58:4,16,18,23 59:6,15,16 98:16 105:22 213:24 214:11 216:12,20 226:22 227:5,6 228:1,2,20 231:19 234:14 235:4,13,14,16</p> <p>exchange 29:14 65:4 108:9 113:19 115:15 116:16</p> <p>exchanged 57:3</p> <p>excuse 26:17 37:21 62:5 63:12 69:9 77:17 84:9 86:3 104:25 115:6 120:24 122:16 125:10 137:17 154:19,20 176:6 178:14 219:8 230:24 234:4,5 239:16,18 240:2</p> <p>execution 244:20</p> <p>executive 99:18 214:13</p> <p>exhibit 21:10,14 22:1,4 87:21,24 89:8,11 98:3,7,8 101:2,6 102:12 104:3,4,19 107:21,24,25 112:25 120:12,15 125:2,6, 23 126:1 155:18 169:21,25 204:18,19 209:10,11 216:25 223:24,25 224:4 225:3, 7 232:3,5,8</p>	<p>exhibits 22:18</p> <p>expect 81:1,6,14 85:9</p> <p>expected 79:19</p> <p>expects 48:7</p> <p>experience 29:13 30:18 36:8 143:19 144:3,23 162:20 163:14</p> <p>Expires 244:25</p> <p>explain 36:5 59:7 95:4,7,12,13 113:4 204:2</p> <p>explained 32:19 44:6 94:25 105:22,24 106:10 185:1</p> <p>explore 71:4</p> <p>external 238:6</p> <p>extremely 102:11</p> <p>eyes 62:16,17,19</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>F3 24:5 26:5 99:7 215:15</p> <p>F5 205:3,5 207:20 208:8 234:4 235:9</p> <p>F5a 204:12</p> <p>fabric 199:20</p> <p>face-to-face 51:19 56:25 62:7</p> <p>facility 18:4 161:16</p> <p>fact 25:10 48:19 50:6,8 66:3,8 87:10 95:8 96:8,15 97:8 99:5 102:22 103:8 111:6 122:4,14 124:5 129:7 130:23 136:10 141:10 157:17 219:2 220:24 221:1</p> <p>factor 168:12 201:8,12,15,18</p> <p>factors 168:23</p> <p>facts 36:25 76:19 113:21 140:8,13 181:11</p> <p>factual 107:2 115:14</p> <p>failing 86:22</p> <p>failure 102:17</p> <p>fair 51:14 113:23</p> <p>fairness 208:23</p> <p>fall 107:7</p> <p>falls 141:13</p>
--	--	---

false 97:12 98:16 113:6 196:23 206:15 207:23

falsely 92:9,12,13 226:21

falsification 111:11 197:22

falsiticity 65:8 109:11 197:23

familiar 78:12,13

family 21:8 44:3 85:8 172:8 179:1 192:8

fan 242:13

fast 131:23

Fast-forward 58:13

father 91:8,15 109:17 110:4,5

fault 120:7

February 8:5 19:10,11 20:7 89:25 104:24,25 113:2 243:22

federal 98:17 146:6,15

feel 10:10 32:10 44:13

feet 139:11

felonies 236:25

felony 141:15 142:2,19 143:15 155:25 184:2

felt 37:4 42:10 130:5 157:4

female 42:7 43:12 46:20 112:8 156:19 195:23 196:5,14,24 197:3 213:25

fender 42:5,20 117:7

field 32:14 36:13,24 41:22 42:15 49:18 50:10 53:7 94:24,25 95:5 102:14,24 103:1 217:17 225:23 239:12 241:7

file 20:25 39:23,24 40:5,14 98:21,23 99:1,5,14,17,25 100:4 101:18,19,20 102:4,9 105:1 194:25 205:12 207:1,6,19 210:17,20 211:10 212:5,25 213:2,6,7 214:8 221:12 225:7 228:1,7,10 230:18 239:3

filed 20:19,22 23:16 43:12 198:9,11 201:14 216:5 220:13 221:8 225:20

files 40:18 58:15 69:2 99:9 102:7,8

filled 63:8

final 22:13 94:23 96:1 121:15 232:3 240:3

finally 54:10 231:4

financial 225:24

find 31:5,22 46:6 60:23 104:16 186:20 200:19 232:25

fine 38:5 97:15,18,19 230:22

finish 172:15

finished 105:2 123:2 159:4

fire 173:24 174:2 176:25 177:1,5 180:8, 18 181:15 197:8,10 208:5

firearm 13:22

fired 115:5 180:17 187:21,23 188:13 196:19 197:13,15 200:17 201:21,23 221:18

firm 9:22

fitting 62:21

five-minute 97:14 233:1

flashlight 18:21,22,23 19:15

focus 12:15,24 14:17 46:14 78:16 79:20

focused 11:20 46:13

focuses 12:21

Follow 44:1

font 28:15,17

force 13:13,16 14:3,9,11,14 58:4,16,18, 23 59:6,15,16 98:17 132:21 147:17,24 149:4 152:18 155:5 156:15 158:4,5,19 168:15 172:22 173:2,13 174:7,10,18 178:23 187:9 188:3 206:3,6 213:14,25 214:11 216:13,20 226:22 227:5,7,24 228:1,2,20 231:15,19 234:14,15 235:4, 13,14,16

foregoing 243:7,13 244:5,8

foremost 121:23 179:14 205:8 206:1

forgot 186:14

form 12:19 14:8 100:10 122:24 175:22 197:17,18 205:1 207:20 208:8,15 211:1, 6,12 212:22,24 235:3,9

forms 40:13 106:13 212:17 214:22

formulating 239:25

forthwith 138:7

forward 25:13 26:23 76:20,22 212:11, 19 237:14

fought 168:10

found 58:1 60:19,22 66:4 69:8 100:16 102:3 115:10 139:25 167:22

fourth 89:22 182:2,11

fracture 151:6 168:4,5 170:23,25 171:2, 9,10 172:5

fractured 151:4 166:24 167:22,24 168:2 183:15

fractures 171:3

Franklin 116:5

free 10:11 48:10 81:2

friends 21:8 55:12

friendship 56:1

front 43:14 104:8,17 112:16 140:20,24 142:20,22 143:25 149:10 163:4 177:1 192:19 194:5 221:1,3

Fryson 24:21 25:7,20,21

FTO 32:14

full 10:5 15:19 19:9 109:11 111:11 172:19

full-time 227:22

fun 195:9,11

fundamentals 13:5

fussing 82:16 88:11 91:17,20

G

G4s 227:17 229:24 235:17

gain 19:18

gaining 233:11,17

Garvey 234:23

gave 31:8 44:24 45:14 47:6 59:21 61:14 83:17 116:24 134:25 157:4 178:6,9 189:16,20 200:23 202:10 204:11 215:22 216:4 235:1

gay 238:20

gears 237:21

gender 65:9,17 88:19 195:10,21,22 197:3 201:15

general 12:1,9 39:11 105:10 171:3 233:25 234:1

generally 38:22 167:8**Gerald** 35:8**get all** 45:7**get along** 74:1**girl** 48:3 93:12,20 94:11**give** 10:2 24:25 25:11 30:12 45:1 47:15
50:14 59:20 64:7,8 73:1 81:3 90:6 102:2
104:20 135:19,22 142:15 161:12 162:4
172:19 178:8 190:9 192:1 210:4,13
211:9,17 215:19 219:19,20 228:18 229:7
230:11 233:20**giving** 136:22 219:18**glad** 75:13**glasses** 157:22**God** 236:1**good** 62:1 66:12,15,23 69:14 97:14 103:9
154:20 198:3 216:18 218:14**Goolsby** 122:15,19 165:15 171:22,23
172:22 176:6,7 179:21 180:7,21,24
181:17 188:2 196:11 220:21 221:5**Goss** 81:13 83:4,11,14,25 84:17 86:4,13
88:12 89:13**gots** 174:8**government** 175:18 179:17**grabbed** 153:3**granted** 85:25**Graveyard** 141:25**great** 198:4 234:2**greater** 142:2 145:19,23**Green** 217:4,15 218:2**Green's** 239:24**grew** 192:6,22**grievances** 178:11 198:10 221:9 238:2**gross** 220:6**ground** 153:5 162:15 167:11**grow** 241:3**Gruber** 243:3**grudge** 239:18**guess** 47:16 55:14**guidelines** 169:8**gun** 189:5,9 190:8**gurney** 166:25**gurneyed** 167:22**guru** 50:2 95:16**guy** 44:9**guys** 48:2,7

H

habitually 49:23**half** 105:6,19 207:9**hallway** 109:3,6 111:12,15 199:1,3**hallways** 199:11**hammed** 163:11**Hampshire** 12:12 27:2,4**hand** 14:10 156:6 158:13 162:11 243:22**handbook** 37:21,25 41:18,24**handcuff** 152:11,14,19,22 155:4,16
167:11**handcuffed** 152:4,5,6 155:3**handcuffing** 14:10 150:2**handcuffs** 150:22 155:6,15 157:12**handful** 50:18 73:3 95:19 119:9 160:5,8**handle** 50:21 85:15,25 89:2 148:5
150:17 151:10 173:16**handled** 51:8 116:14 141:4**handling** 69:4 86:10,11 140:18 141:3
148:6 156:5**hands** 13:17,18,19 14:7,8,12,13,18,21
94:3,4 151:1 158:7 162:11 164:23 178:2**handwriting** 106:15**handwrote** 39:21 40:19**hang** 32:21 55:20,22 56:10,12,13,19
57:13 72:16 95:21**hanging** 55:13 56:23**hangs** 56:13**happen** 29:22 45:25 54:2 90:21 120:9,
11 127:6,8,18,22 195:14 220:18 225:2**happened** 24:10 32:24 33:20,23 34:6
60:20,21 65:3 68:3 72:9 76:6 90:20 93:20
110:10 111:16 117:9 120:6,11 121:4,9,10
125:18 129:16 131:20 132:8 135:24
136:1 141:5 148:20 149:1,6 162:24 167:6
171:19,20 173:8 177:4 179:4,12 184:8
187:4 190:10 200:6,12,15,20 201:21
203:11 206:12,16 213:10,20 214:11
235:17,25 238:16**happening** 127:9,12,14 129:9 190:11**happy** 133:16**hard** 13:18 200:19**harm** 108:22**Harvey** 234:22**hat** 34:11 198:15,24 199:16,19,21,23**haven't** 76:8 167:14**he'll** 48:8**head** 40:12 44:23 45:6 93:23 94:5 134:7,
17 166:22 188:7 198:2 215:3 216:22
221:21 223:10**head-on** 85:5**headed** 50:25 111:22**headlights** 87:8,14,16 117:10,14 118:16**heal** 171:3**Health** 170:6**hear** 9:7,9 22:19 34:6 48:18 70:25
179:25 194:2 222:21 242:9**heard** 36:3 61:9,23,25 62:9 63:15 69:9
115:9 122:21 220:23 238:21 241:7**hearing** 25:16 133:4**height** 54:6 156:14**held** 220:14**helping** 61:7**Henderson** 26:20 73:15 102:25 167:1**herein-above** 244:18**hereunto** 243:21**Hertford** 11:5**hesitated** 229:8**Hey** 175:5 192:19**he'd** 47:13

he's 241:5
hide 212:22
high 11:4,5
highway 32:24 33:1 34:15 35:12,16 78:4 103:7
hire 213:5 216:8 227:14 234:18 235:3
hired 12:8 19:20 33:10 53:22 56:6,8,10 175:24 214:22
hires 217:15
hiring 22:22,25 26:7,18 29:23 212:19 227:21
Hispanic 42:8 219:3,10,19 220:8
history 17:24
hit 44:9 94:2 117:16 118:1,2,4 129:12,18 153:9,10,11 158:1
hold 97:16 139:23,24 156:6 227:19 233:20
home 30:25 33:9 34:1 49:24 59:21 72:18,19 138:11,12,25 139:6,16 146:19 147:3 148:18,19,22 171:19 182:12 189:16,20,22 190:9 200:24
homes 56:15 139:4,5,11
homophobic 238:11,17,19
honor 210:18
hope 216:24
hospital 26:21 45:24 76:3,7,11,17 93:5 167:1 171:15 172:9,18
hostile 239:17
hostility 220:12
hour 38:2 76:15 181:2,3 208:4 227:22
hours 56:11 72:13,20 76:16 240:5,10
house 31:11 56:22 93:3 144:9,13 145:21 147:16,20 148:5 149:7 181:20,21 182:6,9
houses 182:6,8,9
HP 34:15
HR 39:16 59:3,8 177:20,21 198:11 238:7 242:12
huh-uh 10:3
human 28:20 37:11 98:19
humerus 167:24 168:2,4,5 170:24

171:10
hurt 207:25 208:13
hurting 136:13 166:8,16
hyped 68:9
hypocritical 95:10

I

I-85 93:5
i.e 102:17
IA 207:6 208:19 231:14
ice 73:15
ID 8:15
idea 203:22
identification 21:12 22:3 44:4 87:23 89:10 98:5 101:4 104:6 107:23 120:14 125:4 126:3 154:10,11,12 169:23 204:21 209:13 224:2 225:5 232:10
identified 23:2,7 24:20 53:10 126:12 231:5
identify 222:1,4,7 223:3,4
identifying 154:13
identity 12:20
ignore 156:18
Ignoring 41:24 49:13
illegal 225:21
illustration 125:16,20,21
immunities 179:17
immunity 179:15,16 180:14
impacted 225:24
impaired 87:4
impairments 10:24
implying 74:13 224:18
important 31:14,16 164:15,16
improved 151:2
inaccuracies 125:19
inaccurate 207:21
incapacitate 158:2

incident 41:14 42:21 83:4,14 84:1,21 85:17 86:13 89:13 113:11 117:5,12 126:9 131:18,21 132:7 143:7 147:18 149:4 152:17 159:6,10 167:17 170:5,8,13,17 171:18 172:6 173:9,12 187:5,7,15,22,25 190:2 202:23 207:14 218:20 230:17 233:9,14
incidents 51:20 227:4 231:20 233:10,16 235:11,23
including 67:1 68:9
incorrectly 88:4
increase 220:11
indirectly 198:22
individual 23:1 24:20
individually 77:7 195:7
influence 239:24
inform 81:3 90:17 235:5
information 11:3 28:25 29:5 32:23 34:9,10 36:25 39:22 40:21,25 58:5 62:6 66:17 114:25 132:24 133:8,13 135:2 136:22 182:14 184:14 202:23 209:21 210:2 212:14 215:6 222:21 230:11,20
informed 64:16 90:11 130:16 220:15
infractions 236:23
initial 26:9 32:2 126:13,21 133:5,6 240:4
initially 39:14 41:1 52:25 175:21
initiate 77:3
initiated 76:25 77:1
injure 87:18
injuries 120:3 167:16,18
injury 158:16,18 169:12
inmates 160:12
innuendo 94:17
inquired 83:1
inserted 40:25
inside 146:24 202:18,19
instance 137:24
instances 100:17 235:24
instilled 50:11

Institution 18:6
instruct 219:15
instructed 80:8 145:19 155:24 182:24 183:2 220:16
instructing 219:24
instruction 218:23 219:13
instructions 148:4 156:12 170:3
insubordination 113:9,12
insurance 45:24
intensity 156:15
intent 168:9
intentional 183:16
intentionally 120:10
intents 244:21
interactions 56:24
interested 24:13 227:21 243:19
internal 178:10 198:9 204:13 205:22,24 206:2,10,19,22,24 207:1,24 208:2 214:12 220:13 226:20 228:1 231:12 234:7,11 238:1,2,6
interrogatories 22:7
intersection 116:8
interview 24:9,15 25:3
interviewed 25:15
invested 29:15 30:19
investigate 196:24 208:2
investigated 68:23 173:10 175:4 231:20
investigating 174:24 175:2
investigation 175:8 202:24 204:13 205:17 206:2,11,17,19,22,24 207:1 208:4,6,8,14,22 213:14,15 226:21 231:18 234:7,12 239:1,2 241:22,23,25 242:4,6
investigations 109:5 175:12,20 205:22, 25 207:25 242:9
investigative 149:5
investigator 208:2 214:12 227:24 231:10,13 234:22 238:14
invited 24:14

involved 41:6,8 68:12,17
involves 17:17
involving 34:12 76:2,10 115:21 117:6, 11 126:9 128:7 213:13 227:5 231:22 239:15
Iredell 243:4
irrelevant 226:10
Isaiah 239:23
issue 36:16,20,21 39:16 47:18 49:13 63:10 67:18 68:25 75:25 76:1,4,17,22 78:25 79:20 80:23 82:5 86:17,18 87:10, 20 93:21,22 94:4 129:8 174:15 218:24,25 219:2,9,13,15 229:2 235:15 242:2
issued 15:19,21,23 16:15,18 46:24 47:11,14 80:12 88:12 90:13 98:14 103:19 106:12 123:20 185:13,14
issues 32:20,22 34:7,12 60:15,18,19 66:2,3,7,9,10 68:8 75:19,24 76:4 78:25 87:5,7 97:7 184:8 218:16,19 238:5,8,10 242:3
issuing 81:17,20,25 82:1,9,18 96:3
items 39:19
It'll 238:12
it's 40:24 48:10 54:8 71:20 90:21 96:14 105:17 125:18 154:8 158:13 162:5 166:23 167:14 171:11 184:21 196:4 198:2 211:11 224:23 239:17
I'd 31:15 101:16 141:2,4
I'll 169:13,14
I'm 92:4 121:22 146:12 159:4 189:13 225:6
I've 83:15

J

J-A-M-E-L 10:8
J.J. 102:13 192:21
jail 150:3 153:12 154:22 166:13,15,17 184:7
Jamel 10:6
James 180:21
Jamie 81:13,16 83:4,11,14,25 84:17 86:4,13 88:12 89:13

Janie 99:17
janitors 199:12
January 8:4 18:15 20:7 100:8 101:13 218:11
jeopardy 133:22 157:25
JJ 156:8
job 13:4 16:2 18:7,13,17 19:12,14 22:20 23:10,14 24:6 46:17 49:24 62:1 66:24 101:1 103:12 110:17 173:6 176:8,13,19, 20 183:11,12 185:16 203:5 209:23 216:18 218:15
jobless 204:8
jobs 79:22
Johen 39:2,18 98:22 148:16 241:25
John 231:14
joining 75:7
jokes 74:10
joking 74:6 195:14
judge 46:2 150:20 154:21 237:10,11
July 108:4 177:10,11,12 197:11
jump 239:9
jumped 90:14
June 19:21 27:9,12,15,18,19 28:7 100:9, 14 177:10
jurisdiction 13:11 160:13
justice 11:15,21 12:12,17,19,20,21,22,23
Justin 8:6,7 9:15 10:6 20:1 22:5 129:25 244:3
justly 206:18

K

K-A-L-E 227:20
Kale 227:19 229:24 233:9,15
Kenneth 32:18 104:8
key 18:23 19:16
kill 85:8 87:17
killed 81:15 83:18 84:17
kin 243:16

kind 26:2 32:6 38:19 124:16 192:22
236:8

King 93:4

knew 24:23 47:4 54:25 56:23 62:8
112:13 138:3 168:3 194:1

knock 146:23

knocked 146:21

knocking 144:8 147:10

knowing 50:22 112:5

knowledge 49:16 68:14,19,21 70:9,13
74:19 81:23 83:2,5,13 90:24 107:10
127:19,21 165:5 194:6 195:16 199:15
205:20 227:12,15,16 231:6 244:7

L

L-A-T-W-A-Y-N-A 132:7

L-I-L 192:12

L.D. 101:23

Ladder(ph) 35:8

Laden 194:19

lady 44:18

lag 128:19

laid 48:10 241:5

lane 51:1 119:19,22,23

language 88:23 89:5 190:19 191:17
194:15 195:3,4,13,20 198:6

laptop 133:12 153:25 186:12

large 91:8 125:25 202:15 243:4

late 15:22 19:10,11 63:7 141:23,25
144:7,20 147:8 177:12 195:25 241:11

Latwayna 132:7

Lauren 53:15

law 9:22 11:17,24,25 12:1,6,9 13:6,8
36:8 53:22 55:4,16 60:8 77:16 79:7 98:18
143:19 147:5 158:6 159:19 160:23
161:20 168:16 182:3,18 204:7,11,15
212:7 216:8,9 226:5 230:1 236:24 237:17

lawful 169:1 183:18

Lawrence 33:4 35:3 64:14 68:17
104:10 180:2 188:19 195:17,19 196:10

222:3 223:7

laws 78:19,22,24 79:2,15,17 80:7 83:19
84:25 88:13 203:13,19

lawsuit 216:6 230:18

lawsuits 23:15 215:1,9

lawyer 210:18

lawyers 218:5 222:11

layers 13:17

laying 181:11

lead 241:6,9

leadership 220:15 239:6

leads 109:3,6

learn 161:19

learned 220:11 222:12

leave 109:8 111:12 173:13,14,15 225:7
226:5

leaving 19:8 108:20

led 60:3 155:7 213:18 241:2

left 17:25 48:12 85:4 86:23 92:15,16
111:15,18,22 119:19 123:9 180:23
187:12 214:25 228:15 230:1

legs 163:1 164:19

lesser 14:8

let alone 123:17 242:9

letter 66:21 69:9,11,12 177:19 178:6,8

letters 178:9

Let's 90:9

level 13:9 37:5

liability 157:19

lie 208:7

lied 104:9,13

lies 109:11

lieu 8:13

lieutenant 25:25 26:1 34:21 60:5 62:7,
11 63:21 82:6,11 88:8 89:21 92:20,22
104:11 108:14,16 109:25 111:2,7,17
112:17 122:18 171:21 172:22 173:15
175:24 176:6 179:21 180:7,21,24 181:17
188:2 189:1,9,21 196:11 197:23 217:4,20
219:12 220:21 234:19,25 235:1 241:19

lieutenants 51:24

life 85:1 87:1 96:25 105:15 116:21
133:21 192:14

light 102:18

lights 87:15 114:1 116:12 117:21 118:1,
3,6,12,21,23 121:1,7,12,14 128:9,13
129:6,12,18 130:2,4,6,8,10,13,15,17,22
131:4 135:13,16 165:15

likelihood 169:12

likes 103:6

Lil 192:12

limit 51:5

limited 56:25 72:22,25 75:19 202:2

lines 85:2

listed 113:10

listen 194:1 199:19

listening 91:22

live 10:17 57:15,16

lived 27:4 138:19,21,24

livelihood 204:6

lives 85:1 87:1

living 31:18 192:14

LLC 212:3 215:17

Lloyd 26:1 58:5,6 173:22

located 111:14 198:25 221:10

lock 93:18,19 94:7 149:10

locked 94:10 111:24 149:12,17 152:3

locking 149:14,20 152:14

log 154:6,8 186:14,16

long 48:4,11 52:11 73:25 76:9 77:9 78:7
105:18 106:25 109:21 116:22 117:12
119:6 128:15 134:24 135:23 149:6
150:12 152:16 161:1,11 162:5,8 165:24
167:14 170:24 194:23 201:9,25 207:7
209:20 236:5

longer 32:17 49:8 59:19 76:13,14 78:10
118:10 165:13 189:7 190:6 214:6

looked 22:21 28:13 66:19 117:25 119:13
203:24,25 224:16,18

lookout 62:20

loosely 91:12**Lori** 243:3**lose** 77:10,13 176:8,12**losing** 176:19**lost** 31:20**lot** 33:19 48:9 90:20,21 95:17 106:7
114:2 143:6 150:3 160:4 196:14 228:21
235:25**loud** 180:22**Louisburg** 18:14,25 33:23**lounge** 56:20**lower** 153:3 162:11**Luckily** 120:2**lunch** 55:24 56:14,16,17 57:14 74:24**Luther** 93:4**lying** 224:25 225:1**lyrics** 192:13

M

mad 189:19**made** 35:6 68:9,24 71:7 100:18 103:4,5,
11 123:14,15,18 124:6 149:17 155:23
157:9 172:25 174:19 196:21 198:14
217:9,10 221:12 222:1,4,8,16 229:15
230:17 237:23 238:4 241:21 244:11**magistrate** 46:2 80:15 138:8 150:20
164:25 172:17 237:10**Magistrate's** 80:14**magistrate's** 155:2 184:4 237:2**mailbox** 198:15,25**mailboxes** 199:7**major** 35:14 49:11 51:25 78:5,6 86:16,
17,18,19 87:5,9,10,20 96:22 97:5,6
105:9,14 133:1,3 134:12 135:7 136:20
137:16 185:3 231:14**majority** 105:23**make** 14:22 64:6 71:17 78:15,17 86:21
99:5 102:15,21,23 104:22 108:17,21
112:18 144:7 146:1,7,16 168:17 172:6
194:20 195:9,11 213:6 214:9 226:15
237:23 238:17,19**makes** 174:1**Makin** 69:20 70:3,5 71:5 72:2 73:8,11
74:11**Makin's** 70:6**making** 49:21 74:10**male** 42:8 54:17 137:6 140:21 191:24,25
197:3 220:8**males** 239:15,19**malicious** 212:20**man** 25:2 42:9 44:18 46:4 57:5 82:17
91:4,9,16 93:9,12 94:9 110:5,22 112:21
114:23 147:10 192:19 219:19 238:21,22**man-to-man** 113:17**management** 37:11 104:15 107:13
123:14,18 163:21 164:3 206:14 219:18
221:13 222:14 228:18 239:6 242:11**manager** 28:21 214:13**managers** 16:24**maneuver** 151:2**manipulation** 122:25**manner** 8:20 131:23 195:14**manual** 38:17 41:18 162:6,18**March** 23:12,13 117:5 126:9 127:11,13,
18 211:5**Maria** 26:21 93:5 166:25 170:6**Marin** 32:9 62:25 66:14,22 76:1 92:12,
19 93:2,7 108:3 109:10 112:18,20
113:16,17,18,21,23 114:3,14,18,21,22
115:21 116:8,11,18 143:8 217:17 240:22,
23**Marin's** 63:18 68:5 217:12,16**Mark** 120:23**marked** 21:11 22:2 87:22 89:9 98:4,7
101:3 104:5 107:22 120:13 125:3 126:2
169:22 204:12,20 209:12 224:1 225:4
232:5,9 235:3**markers** 154:13**Martin** 93:4 191:24 192:2 193:12 194:4,
14,17 220:21 221:2,15 223:23 238:13**Martin's** 99:18**master's** 12:11,16**materials** 37:8 38:14 161:21**matter** 8:6,16 78:18 83:8,10 88:20,23
128:24 136:10 150:17 154:22 184:20
203:12 204:5 214:19 215:25 226:9**matters** 173:17**Mcgurl** 9:6,11,12 10:20 97:15,17,18,22
144:25 145:4**means** 12:18 95:13 171:2,10 195:12
205:13**meant** 28:2 113:8 133:10 192:9**measurement** 139:10**mediate** 114:7 115:23,24**medical** 39:8 163:6 164:16 171:14**meet** 179:22 181:1**meeting** 221:4 222:11**member** 180:6**members** 21:8 44:4 53:21 75:21 175:6
220:15 224:24**memory** 54:9 81:24 140:12**mention** 15:14 16:4 58:19,20 88:14,15,
19 190:2 201:7,12,15,17 216:12**mentioned** 15:11,16 17:25 19:22 25:23
26:8 27:20 35:18,23 43:7 47:23 49:15
54:23 59:10 65:10,18 68:22 71:5 72:6
84:16 88:17 95:15 128:18 141:17,20
142:4 143:3 154:14 187:6 190:3 193:12
194:13 223:13 232:24**merits** 80:18**messages** 57:1,3,8**met** 21:2 26:20 55:10 66:5 177:11 181:3
197:12 222:14**methods** 13:24**Mexican** 219:10 220:8**Mexican-hispanic** 218:24 219:1**Michael** 9:6,11**mid** 177:11**middle** 10:7 90:10 103:17 105:5**midnight** 170:21**miles** 116:3**mind** 38:2 86:9 131:17 144:12,13 179:14
208:10 223:6 233:20

minimis 14:11,14
minor 42:5 49:11 75:25 76:1,3,21 87:7,8 95:2 117:7 134:9
minorities 220:2 239:15
minute 119:8,9 165:12
minutes 38:4 73:23 97:19 188:14 236:7
miscellaneous 99:8
misdemeanor 142:3 143:14 184:2
misdemeanors 236:24
misquoting 71:20,22
missing 31:17
mix-up 185:7
mocking 192:3 193:17
model 133:15 185:23
modular 138:25 139:4,6
mom 44:5,8 94:2
moment 210:5
month 99:3 101:17 193:9
months 12:8 42:12 92:10 110:11 175:23 190:24 204:9 205:23 207:4,10,12 234:8
morning 141:23 142:1,7 144:8,19 179:22,24 180:8
mornings 144:20
mother 43:12,18 44:17
motion 93:24 225:7
Motor 49:2
motorist 51:9 118:20
Mount 11:11,12,13,16 17:25
mouths 97:4
move 26:22 76:22 98:7 101:5 105:19 125:23 132:6 138:9 210:23 212:11,19 237:14
moved 31:18 92:11 203:22
movements 108:21
moving 25:13 39:13 52:22 78:2 107:24 115:19 131:7 218:22 220:10 221:10 241:16
multi-colors 199:20

multiple 50:7,13 52:6,20 85:2 88:25 122:6 130:14 132:23 134:8 143:14 168:22 182:8,9 185:20 186:18 195:25 221:1,3 231:20,21
mumbled 135:21
munition 13:19
munitions 158:8
mute 9:7 124:10,13

N

named 226:10 244:18
names 49:5 117:1 142:15 154:8 228:17, 18
naming 226:1
nasty 110:1,16 112:23 217:6,20,24
nature 41:17 57:5 221:19
NC 78:3 215:16
nearby 139:4
necessitated 226:1
neck 163:1
needed 16:6,7,25 26:17,23,24 27:1 28:19 37:1,5 59:19 105:8,21 189:7 190:6, 8 213:13 214:6
negative 92:5 204:11 226:23,24 227:1 229:8 235:19
negatively 225:23
neighbors 139:1,3
Nicholas 234:22,23
night 69:25 87:16 117:20 128:1 139:25 140:2 141:11,23,24,25 142:1,7 143:15 144:7,9,19,20 167:23 170:18,20 187:9 240:17,22,24
nights 61:18
nighttime 87:8
noise 69:12
non-attorneys 21:5 200:10
non-compliance 15:5
non-compliant 15:9 150:25
non-cooperative 15:9 150:25

non-sworn 199:5,8
noon 144:19
normal 72:13,19 76:15 151:25
north 10:17 11:6,11,12 18:1 20:1 50:25 55:6 116:14 135:1 154:7 186:15 203:19 212:3 243:4
northern 84:24 86:12
notarized 27:1
Notary 243:3,24 244:15,23
note 125:19 203:3 245:4
notebook 202:6,8,9,11,12,20 203:8,12, 17,21,23 204:1
noted 124:20 126:25 244:10
notes 40:2 203:2
notice 21:17 134:1 145:2,8
noticed 117:14 149:9
notwithstanding 144:2
November 18:3,15 19:10 42:23 59:25 72:11 107:9 160:20 217:12
Ns 192:14
number 21:11 22:2,5 53:9 80:12,16 87:22 88:2 89:9 98:4 100:21 101:3 104:5 106:12,14,19,22 107:22 120:13 125:3 126:2 128:16 135:2 169:22 186:11,13,14, 17 204:20 205:9 207:19 209:12 224:1 225:4 232:9
numbered 243:13
numerous 40:8

O

oath 8:14 27:16,18 183:13
object 31:23 38:18 71:18 124:16 129:20 146:10 226:7
objected 124:17 126:24
objection 39:7 71:10,18 126:25 144:25
objections 8:19 145:7 146:7,16 226:16
objective 13:9 182:18
obligated 175:1
obligation 242:8

obligations 79:7,9,16
Observe 19:1,13
observed 84:23 95:3 132:23 190:25
observing 32:10
obsessed 182:19
obtain 210:2
obtaining 212:9
occasions 121:16,20,23
occur 207:14
occurred 20:4 42:21,22 46:25 111:16
 170:8,13 177:7 187:23,25 194:8
occurring 170:10
October 132:8,13 147:18 159:10 167:17
 170:14 178:21 207:15,17 221:23
off-duty 56:24 57:2 188:16
off-record 155:11 209:16
offence 237:7
offended 203:8
offender 184:22
offenders 18:12
offensive 88:22 89:5 195:13
offer 26:15 215:20,21
offered 26:11
office 8:7 15:22 17:6 19:21 22:19,24
 24:19,23 27:16 32:3 33:14 34:16 35:17
 36:7 37:17,20,22 38:15 39:5,12 40:10
 41:12,18 42:1,4 43:2,24 45:7 46:11 49:7
 50:17 52:10,16,23 54:24 56:6,9,17 57:21
 62:8 68:16 80:14 96:12 98:16 99:17,18
 100:13 101:20 102:6 105:11,16 109:9
 111:14,18 112:1,4,6 131:10 136:16
 153:22 154:2,4 155:2 157:21 159:12
 163:18 164:24 178:17,19 180:17 182:15
 186:1 187:11,12 188:17,18,20,22,24
 189:24 190:18 195:6 199:4,11 200:22
 201:12 202:5 204:3 207:8 211:2,8 212:5
 213:11 214:5,25 215:14 216:6,14 222:13
 224:24 227:4,9,13 230:2,10,19 231:13,
 21,25 232:17,21 233:22 237:20
officer 11:18,24 13:6,7 14:22 18:8,15
 19:11 32:14 36:9 41:22 48:21 49:18
 77:16 78:4 102:15 113:7,8 143:20 144:15
 147:3,5 148:2,10 150:7 159:18,19,22,24

160:1,2,9,12 164:10 168:16 179:16 204:7
 205:23 212:2 219:4 230:1 233:23 237:8,
 11,17
officers 16:25 61:20 79:7 147:25 150:5
 160:22 196:15 236:24 241:6
offices 109:4
official 89:12 100:22 171:15 179:16
officials 228:17
Olive 11:12,13,16 17:25
Oliver 132:7,8,9,11,18,19 135:14 136:17
 138:3 147:14 156:25 157:22 159:6,10
 164:12 167:16 170:4,6 171:7 178:22
 179:3,11,24 180:17 181:10,17,19 182:19
 183:17,22 184:14 185:12,18 186:3 187:4
 190:2 206:12 207:14
Oliver's 134:1 138:11 146:18 184:25
on-boarding 37:9,10,12 38:16,19 42:15
on-the-job 32:3 38:25
one-lane 119:21
one-sided 175:12,19
one-year 230:3
one's 62:21
ongoing 205:21,24 206:2,10,18
online 27:3,5
onward 198:18
open 62:16,17,19 147:10
open-eye 213:15
opened 61:22 189:3
operation 84:21
operations 41:15 85:16 202:24
opinion 134:9 145:20 208:11 220:5
opinions 239:25
opportunity 29:11,21 30:15 61:14,16,
 21 90:6
Opposing 145:25 146:3
options 157:5
oral 25:14 29:24 30:4 238:3,4 242:3
orally 30:16 41:25 82:14
order 10:3 73:24 184:3,4 186:9 237:2

ordered 241:23
orders 96:4,6 169:2 183:18
ordinary 137:15
orientation 37:12,14 38:20,24,25 39:1,
 3 65:17 88:19 89:6 102:10 201:17
originator 63:5 67:3
Osama 194:19 223:21,22 224:13,15,17,
 18,20
other's 56:15
outcome 184:10
outstanding 138:2 185:25
overrule 174:13,16
o'clock 117:20 181:5 188:14

P

P-A-R-H-A-M 73:16
P-A-T-E-L 194:18
P-R 194:18
P-U-R-A-V 194:18
P.C. 46:6
p.m 233:5
p.m. 70:22,24 74:23,24 75:1 97:21,24,25
 98:2 124:12,24 125:1 127:22 144:5
 145:22 155:10,13 165:2 170:16 186:25
 187:2 188:13 233:5 236:12 242:21,23
PACER 215:12
pages 28:15 39:25 98:9 99:7,12 202:18
 211:15 243:14 244:5,8
pain 166:7,14
panel 29:25 30:5
panic 164:15
panicked 131:23 164:14
paper 28:17 58:17 85:10 202:19 238:9
papers 46:16
paperwork 31:14,17 33:19 81:1,7,14
 115:25 173:19
paragraph 88:1,3 90:10 91:6,7 94:23
 96:2 103:18 105:6 155:20 170:24 171:1
 220:10 221:10 225:11,17

paragraphs 170:23
paramedic 166:2,5,9
paramedics 151:4 165:12,23,25 169:19
Parham 26:21 73:16 93:5 167:1 170:6
park 148:21
part 15:2 16:1,8,12 37:8 38:16 46:17
84:24 85:15 86:11,12 95:25 103:12
105:17 110:3,7 122:23 161:21,22 171:1
188:15
part-time 19:19 188:16
participating 8:9 10:12
parties 8:18,23 36:7 212:13 243:17
party 82:17 140:23 177:1,2 180:6 226:2
pass 119:17
past 75:16 124:6 174:9,17 199:13
Patel 190:24 191:16 192:4 193:17,18,22
194:13,18 223:14 224:11,13,25
path 168:14
patrol 32:24 33:1 34:15 35:4,12,16
59:21 64:14 78:4 84:24 103:7 108:13,14
109:2,5 110:15,25 111:18,19,22,23
132:23 151:24 154:24,25 155:15,17
173:23 190:10 199:2 200:24 221:16
pause 127:3 128:5
pay 77:19 240:6
PC 85:24
PDF 40:19
peace 13:10 14:2
Pearsall 73:11
penalty 8:16
people 45:23 52:4,23 54:8,22 60:7 64:22
76:12,13 83:19 84:17 90:13 92:4 97:4
115:6 137:11 139:8 142:15 143:4 153:23
154:8 185:24 191:16 192:8 217:14,20
219:10
people's 85:1
pepper 13:19 15:11,12,14,16,17,19,21,
23,25 16:1,4,8,11,15,17,18,20 17:5,12,17
157:14,17 158:11,21 159:7,9,15,23
160:2,12 161:7
perceive 158:9

perceptions 144:11
perfectly 139:10
perform 103:20
performance 32:20,22 34:7,12 66:11
99:10 100:6 198:19 218:10,12,16,17
performed 192:12
period 107:3 142:6
perjury 8:17 42:17 137:21,22 163:11
permission 211:9
Perquimans 11:5
Persall 73:11
persecute 241:19
person 8:14 15:1 23:3 55:1 56:12 71:6
80:21 107:11 109:15,24 121:13 135:4
145:21 173:16 181:24 182:14,15,17
186:19,21 202:3 217:23,25 237:2,4,8
person's 25:18
personal 18:22 19:16 56:1 66:10 73:5
75:24 134:15 136:14 199:8 203:2 218:16,
17
personality 92:24
personally 132:15 231:23 244:18,20
personnel 20:24 37:11 39:23,24 40:5,14
67:18 98:21,23,25 99:1,14,17,24 100:4,5
101:18 102:3,7,8 199:5 203:11 210:17,20
211:10 212:4,25 214:8
persons 165:11 218:24 219:1,14,16
pertains 102:13
pertinent 43:4
Peter 22:6 25:1 57:24 195:2 221:23
223:2
ph 69:20 73:11
philosophy 133:14 185:23
phone 27:6 57:6,7,8 72:15 73:5,7,8
82:15 91:19,22 109:15,24 110:1,14
112:15,22 114:4 173:11 179:22 187:7,9
216:15
phonetic 54:12 71:6 106:24
photo 154:12
physical 14:9 169:2,9

physically 8:10 72:18,19 108:18 153:7,
8 162:2
pick 140:17 141:2 142:22
picture 154:9 172:19 219:21
piece 112:24
pinpoint 132:2 157:7
pitch 87:15
pitch-black 128:1
place 10:15 28:19 59:4 68:7,15 73:15,24
121:14 129:13 143:7 152:11 156:21
157:24 181:12 183:15,23 198:16 206:21
208:22 213:13,16 214:14 221:7 227:4,15
243:8 244:6
placeholder 125:24
placing 162:10
Plaintiff 22:5 225:22 226:3,5
Plaintiff's 225:20
plan 218:4,5
plans 179:3
plate 132:24 133:11 134:25 135:1,2
184:9 185:6
play 58:19 112:21 127:1 128:2 194:3
played 201:7
plays 128:4
pleasant 158:19
pleasure 175:15
point 28:3 31:24 42:18 51:4 80:1 86:25
107:17 108:21 115:9 118:11 138:6
145:12 157:6 164:11 165:16 166:11,24
183:21 196:2,3 226:11
pointed 79:21 103:18
pointing 103:21
points 26:4 97:17
police 13:6 16:24,25 50:3 55:11 135:13
147:3 160:23 164:18 212:1,2,3 214:13
215:16 227:17 229:24
policies 37:15,16,19 39:3 40:10 41:25
43:1 47:21,25 49:14,19 195:25
policing 133:14 185:22
policy 38:17 39:4,11,17 142:18 157:19
158:9 206:7

Pool 54:7,25 221:17	print 154:1	protected 176:25 177:18 178:10 181:15 215:6
Poole 57:11,25 58:11,18 91:22 104:8,17, 18 108:15 111:1 112:15,20 113:18,21 114:19 115:15,16 116:4,15,18,20,22 188:3 191:1,6,8,13 200:11 201:7,20,22 220:22 221:16	printed 154:3	protecting 13:10
Poole's 116:21	prior 21:16 24:18 67:25 72:5 130:4,6 156:11 157:5 190:24 191:17 238:5	protection 175:17
pop 73:19	priority 95:1,6 103:5	protective 198:10
portion 198:3	prison 33:21	protocol 158:10
position 18:25 22:20 24:14 27:17	prisoners 160:17	protocols 158:9 169:8
positions 14:10	private 45:19 202:3	provide 8:14 17:15 28:25 36:24 51:9 78:19 157:21 163:8,15 167:6 182:14 217:19
possibility 118:7	privilege 226:8 230:25	provided 16:23 17:7 21:1,15 32:23,25 34:8 37:5,16,18,20,22 39:3,6 41:19 62:6 89:20 116:6 121:6 135:12 202:8,9 240:1, 2
possibly 17:17 40:9 71:6 171:22	probability 67:22	providing 39:17 235:19 240:2
potential 26:24 212:23	probable 52:8 80:19 237:13,14,15	provision 79:12
power 78:17	problem 36:5,9,11 61:19,23 66:9,24 67:1,2,20 175:14 220:1 228:6 234:9	provisions 37:25
practice 81:11 96:2	problems 34:23 62:22,23 64:18 74:4	provocative 111:8
practices 41:25 42:3 43:1 49:14,20	Procedure 146:6,15	proximal 171:1
praised 95:22 218:10,11	procedures 37:15,17,19 42:3 47:22,25	proximity 139:2
precedes 100:11	proceed 229:18,19	public 12:14 13:1,7 18:2 20:2 87:6 105:10 114:5 115:22 160:13 163:9,23 179:16 243:3 244:15,23
predated 175:23	proceeding 8:10,11,12	publicly 215:10,11 216:3
preparation 20:16 21:6	PROCEEDINGS 8:1	puff 199:21
prepare 20:10	process 12:3 24:9 26:15,19 29:23 37:9, 10,12 38:17,20 39:1 41:7 42:15 53:23 60:5 79:24 80:10 151:23 156:24 175:16 212:19 238:14	pull 48:13 51:2,6 69:2,5,6 80:16 97:6 120:15 133:13 134:23 149:13 185:21 189:12,13 204:17 209:10
prepared 10:21 20:12 166:25	processes 38:21,24	pulled 33:14 48:14,17 50:6,13,14,15,18 66:19 85:6 87:13 121:8 149:15 162:6,19 166:4,19,22 189:10
presence 13:18,25 102:19	processing 164:25	pulling 48:16 52:4 95:14 113:23
present 8:11,23 9:12 21:5,8 28:8 72:18, 19 169:24 189:24 237:9	produce 126:16	Purav 194:18
presentable 27:11,25	produced 126:10	purple 198:15,24 199:17,19,21 239:10
presented 28:11 29:11,18,20 30:14 122:11	production 22:7	purpose 60:11 64:22 210:19 232:14
preserving 13:10	professional 27:10 74:9 136:4	purposes 14:4 16:3 24:21 101:8 202:21, 22 203:5,10 212:8 244:21
pretty 10:1 48:10 112:24 134:5 161:10 163:20,24 165:6	prompted 184:24	pursuant 76:15 226:4
prevent 14:2 180:15 204:14	pronounce 196:6	pursuit 136:5
prevented 225:22 226:18	proof 227:8,11 233:10,16,18	push 154:24,25
preventing 185:15 235:12	proper 157:18 208:7 214:8	
previous 23:15 24:3 79:21 91:1 96:4,6 215:1	property 45:19 147:19	
previously 24:6 30:14 33:22 34:11 78:3 91:2 98:7 106:5 117:10 144:17 149:23 185:1 214:17 228:4 234:3 240:1	prosecute 241:20	
	prospective 226:25 227:10,13 229:22	
	prospects 207:25 225:24 226:19	
	protect 87:6 96:24 105:15	

put 46:1 63:4 68:2,4 85:1 90:25 91:1
92:10,13,24 94:3,4 115:25 116:21 119:3
121:25 123:13,16 133:21 134:5 150:19,
22 153:2,11 162:19 185:12,17 238:8
239:8

putting 87:1

PVA 135:18

Q

question 23:17 31:25 39:6 52:1 63:7
65:13,15,16,23 82:12 90:17 93:2 99:23
110:20 114:23,24 129:21,23,24 130:14,
20 145:11,14,18 146:4 147:13 151:22
159:3 191:14 196:25 197:4 205:16 208:9
211:19 214:18 218:6 223:1 226:14
233:13 235:19 240:3

questioned 117:11 120:24 188:8

questions 26:2,5 27:6 33:7 75:3 123:4
131:16 188:9 190:7 218:18 233:2,8
236:6,17 242:17,19

quick 185:3 231:17

quickly 70:16 85:22 118:25 119:4,5
137:14 138:1

quiet 189:23

quote 179:21

R

race 26:8 65:9,17 88:14,15,16,17 177:17
195:9,21 201:7,12,13 217:21 219:24

racial 88:22,24 190:19 191:22 223:16,19

racism 203:15

radio 48:18 50:20 63:15 95:20,23 107:18
114:4 115:22 116:11,15,17 132:4 135:7
184:9 185:4

radioed 132:24 133:10

Raleigh 11:11

rammed 238:21

ran 230:3 242:13

rang 112:15

Ray 54:11 173:13,14 188:19 241:4

Ray's 61:24 67:23

re-certified 229:25 230:5

reach 216:2

reached 24:11,12

react 33:13 118:15 136:3 152:20 164:13
191:6

reacted 191:9

reaction 75:7

read 29:1 37:24 90:2,3 167:14 171:5
244:4 245:8

reading 88:4 170:22 185:5 243:20 245:3

ready 60:7,13 120:20

real 75:10 77:8 166:8 242:15

realize 82:16 157:2

reason 11:20 31:16 34:4 43:17,18 52:8
57:22 59:21 64:16 94:11 103:20 105:25
106:1 127:20,23 129:5 171:12 190:13
200:17,18 215:19,22,23 216:3,4 220:4

reason(s) 245:5

reasonable 147:9,12 213:6 214:12

reasons 75:10 113:5 134:15 239:20
241:10,20

reason's 44:10

recall 16:8 21:22 23:19 26:6 30:22 51:10
52:19 54:1 81:19 104:2 105:17 110:7
131:25 132:25 134:6 146:20,21 147:1
170:10 176:11 194:23 195:4 196:20
236:4

recalled 49:16

receive 32:3,6 81:1 85:10 237:4

received 32:8 43:11 47:23 100:24
126:15,23 148:3 178:25

recently 232:4

reception 23:1

recess 38:3,10 70:22 74:24 97:25 124:24
186:25 233:5 236:12

recognize 89:18 210:25

recognized 56:7 112:12 239:14

recollect 194:11

recollection 52:12,17 103:23 165:5
194:7,8 207:13

recommend 121:17 122:9,22 150:19

recommendation 122:13 168:18
174:10,17

record 8:4,22,23 10:5 20:12 38:9,12
53:20 70:21,24 74:13,21,23 75:1 97:13,
24 98:2 100:10 124:12,21,23 125:1
136:22 155:8,9,12 163:9,24 165:1,2
184:15 186:22,24 187:2 215:24 233:4,7
236:11,14 243:14 244:5,8

record-keeping 101:8

recording 122:15 132:3 133:8 134:23,
24

recordings 122:15 163:22

records 66:19 74:15 99:21 211:22
215:10

recruiter 210:2

recruiting 233:23

rectangular 202:16

red 102:18

redirect 236:8

reduction 150:20 168:18

refer 84:21 85:16 146:5,14 149:3 152:17
161:24 195:1

reference 26:24 27:1 43:10 104:25
108:8 110:21 113:10 120:23

referenced 158:10

references 204:12 226:23 227:1 229:8
235:19

referencing 224:17

referred 34:15 54:16 161:25 194:17

referring 35:20 36:1 37:11 42:16 78:23
82:8 83:3 91:17 92:4 104:13 108:7
113:12,14 156:1,16 175:20 178:13 180:1,
3,9 218:9 224:19 227:1 234:12 238:1
240:7

refers 114:6 133:1

refresh 140:11

refusal 124:5

refuse 36:10 123:10,12

refused 123:5,8,11 124:2,18

regard 118:17 187:5

registration 134:19 regret 109:10 183:10,11 reimbursement 232:13,15 reinstated 24:6 33:22 related 72:1 126:15,18 181:7,9,13 relation 148:21 relationship 56:1 64:18 65:25 70:6,8,9 74:6,9 release 209:5,8,21 210:17,19 211:1,6,12, 21 212:4,11,14,17,22,24 released 212:24 releases 212:8 214:15 230:4 releasing 213:2 relied 162:20 163:13 relief 76:3,7,15,18 209:8 rely 52:10 150:12 162:18 remain 57:10 remarks 221:12 remember 20:3 22:25 23:11,18,24 24:1, 3 26:2 27:21 28:13,23 29:3 30:6 31:6 39:16 40:11 42:20 43:2,5,9 50:24 52:4,12 53:13 54:3 73:6,7,10 74:5,10 84:12 85:13,18 91:3,10 103:21,24 105:12,13 106:3 108:6 109:20 111:5 113:1 117:5,7, 17 118:11 127:9,12 131:8,13,15,24 132:5,20,22 134:17,22 135:3,6,15,16 136:1 138:13 140:9,15 149:1 161:4,5 162:9,10,13 163:4,6,12 164:8,9 165:8,10, 18,22 167:3,7,8 170:15 171:22,24 172:1 176:5,7 184:17 188:6 195:23 197:6,7 199:22 202:1,17 203:10 206:25 216:21 223:19 225:1 236:2 remembered 73:18 remembering 16:7 remorse 76:19,21 remote 9:13 remotely 8:12 9:5 remove 131:6 171:16 209:1 repeat 65:16 130:20 135:24,25 151:22 184:21 233:13 repeating 36:6 167:13	replied 111:3 report 19:1,13 37:2 41:14,15 44:16,17 84:21,22 85:16,17 117:13 125:11,12 134:4,16 138:17 140:9 149:4,5 150:13,19 151:18 152:17,18 153:2,11 158:5 172:6, 15 173:12,13 202:23,24 204:12,24 205:1 208:19 226:20 228:20 234:4,5 238:23 reporter 8:3 9:2,5,9,13 10:4,11 21:14 38:8,11 70:20,23 74:22,25 97:23 98:1 124:11,22,25 126:5 127:1 155:9,12 186:23 187:1 225:12 232:5 233:3,6 236:10,13 242:20 reporting 8:12,20 reports 49:6 50:16 52:10,16 100:22 138:17 140:5 149:4 151:16 163:4 165:25 167:15 170:18 176:9 represent 9:21 representing 215:25 reprimand 81:17 89:12 reprimanding 81:19 request 15:23,25 106:20,21 126:15 139:19,22 183:18 214:8 requested 15:24 16:13 101:18 139:20 140:16 222:21 243:20 requests 22:7 126:14,18 require 14:3 required 79:8 86:16 157:20 182:1 189:7 215:15 requirement 211:24 reread 127:15 rescinded 197:10 215:20 residence 10:16 resist 156:25 resistance 168:12 169:1,3,7,10 resistant 153:13 resisted 152:25 168:10 169:5 173:7 213:25 resisting 153:6,7,8 155:5 157:3 164:22 169:1 resistive 15:8 150:24 resources 28:20 37:11 98:19	respectful 217:5 218:1 239:22 241:5 respond 36:14,18,19,20 48:8 82:24 90:7 192:24,25 responded 132:2 167:8 191:13 responding 113:24 131:8 219:3 241:13 response 22:6 136:3 150:16 178:10 242:7 responsibilities 18:10,25 19:12 34:17 35:19,20,21 77:11 185:14 responsibility 34:18 120:1,4 129:10,15 169:20 responsible 68:15 114:15 rest 92:3 restorative 12:22 restrict 180:13 result 116:14 168:11,19,21 205:17 resulted 151:1 242:4 retail 19:19 retaliation 181:13 216:5 retaliatory 181:14 retired 78:5,6 133:3 223:8 return 41:16 80:21 237:19 returned 136:15 200:5 revealing 20:8,13 reverse 119:3 review 20:14,16,21,24 24:16 25:14,23 26:9 29:24,25 30:4 37:7 38:16 39:15 41:11 69:7 74:15 80:16 89:14 98:8 99:1, 13,24 101:6,18 104:20 107:25 120:16 125:7 169:25 204:23 210:5,13,21 211:17 213:5 217:2 224:6 225:18 232:6 237:11 reviewed 20:15 38:14 39:23 40:13 41:10,14 98:22 99:13,16 100:25 210:8 reviewing 40:9,10 105:3 173:18 Riceland 25:19 ricochet 157:24 ride 59:21 189:16,20 190:9 200:24 riding 48:14 52:3 75:18 217:17 rights 98:17 136:11 175:16,17,18
---	--	--

rise 226:2
risk 133:21 143:22 144:23 145:19,23 157:25
risks 143:20
risky 143:24 144:4,6
road 43:4 73:16 76:14 81:14 87:5 116:8, 9 119:21 138:22
roads 93:5
roadway 121:2
Roberson 53:9 54:10,11,12 63:7,9,24 64:25 66:8 92:20 96:9,18 104:24 106:21 107:12 218:9,14 238:24,25 240:21,23 241:17
Roberson's 60:24 107:7 240:13,15
Roberson's 54:16
Robinson 9:3,4,13 31:23 38:1,6,18 65:4 70:15,19 71:10,16,20,25 101:7 123:1 124:10,14,15 126:6,10,17,23 129:20 145:12,24 146:2,8,12 210:4 226:7,13 236:7,16 242:16
rode 32:8,14 53:2 61:17 217:22
role 54:1
roles 53:24
romantic 70:8
room 8:11,23 10:18 25:24 82:17 108:15 109:2,6 110:25 111:12,19,22 199:2 221:16
rotated 76:11 162:12 240:16
rotating 162:17
rotation 240:24
roughly 171:24 172:1
rude 110:1 217:6,20
Rule 146:6,15 222:11
ruled 226:9
rules 9:14 205:18
run 45:24 134:18 196:16
running 106:1

S

S-H-E-F-T-A-L 54:21

S-U-T-T-O-N 235:1
S33 63:14
safe 49:25
safety 13:7,10 18:2,15 20:2 87:6 133:21 157:25 160:13
Saturday 86:1
save 96:24
scared 94:12
scene 14:24 123:14,15 150:6 165:10,17, 18,19 167:3
scheduling 38:3
school 11:4,5 53:23 140:19 141:3 148:6 156:5
Science 12:11
scope 226:11
scratching 44:23 45:5
screaming 152:2 166:18,20
screen 21:15 112:25 125:24 131:7 209:2
scroll 21:20 22:10,13 89:16,19 90:9 98:11,12 211:25 225:12,15
scrolling 22:10
SEAL 244:25
search 141:10,17,20 184:25
searched 232:23
searching 186:11
seat 85:3
seconds 115:11 119:9 127:16 128:16 233:20
secretaries 199:8
secretary 99:19 109:3
section 225:18
secure 209:4
securing 225:23 226:18 235:12
security 19:11 205:9 207:19
seek 16:20
seeking 214:19
seeks 226:3,5
send 16:25 57:1 125:25 134:24 209:5

sends 213:6,7
senior 45:12 54:17
sense 156:25
sentence 102:13 105:20 193:14
sentences 121:15 122:10
separate 61:3 94:15 102:6,8
separated 62:15
separation 204:13,24 205:1,16 226:20 234:5
September 18:3 99:2,3,16 101:17 107:8
sergeant 32:9,13,16 34:8,13 35:2 41:22 47:24 48:19 49:10,15 51:16 52:3,7 53:2, 3,5,8,18 54:6,11,12,16 60:4,24,25 61:1, 11 63:3,7,8,18,24 64:20,21,24,25 65:4 66:8,14 68:5,6 69:1,13 72:10 75:4,22 76:1,18 77:1,11 85:12 86:5 92:12,19 93:2,7 96:9,17 104:24 106:21 107:7,11, 12 108:3 109:10 111:25 112:7,15 114:7, 22 115:13,15 116:2,19,20 117:24 120:22 121:2 122:16,20 140:16,17 142:21 148:4 155:24 165:13 166:11 176:3,4,6 183:1,7 186:4 188:2,4 191:24,25 194:17 195:24 196:3 218:9,14,18 220:20 221:2,15 223:23 231:9 238:11,12,14,24,25 239:11 240:13,14,15 241:7,17
sergeants 51:24 52:2 191:21 218:10 221:6
Sermons 46:1
serve 41:16 50:5 80:2,20,21 81:4 85:18, 22,23 110:16 139:18 141:6,15 143:21,25 144:4 145:21 155:25 156:6,8,11 181:23, 24 182:13,21,22,24 183:5,8,12 184:1 237:16,18
served 46:7 81:6 86:2 141:9,11,24 142:5,6,8,20 143:8,11,14,15 144:16,18, 22 186:1
service 59:19 114:5 133:25
services 58:11 132:2 163:21 164:2,16 182:7 189:5,6 190:5 200:23 214:5
serving 13:9 46:15,16 49:21 90:12,23 91:5 110:19,22 111:4 181:19 183:10
sessions 21:6
set 22:6 24:24 27:7 241:19 243:21
severe 134:12 225:24

sexual 65:17 74:10 88:19 89:6 201:17**shaking** 94:5**share** 21:15 126:5 131:7 132:4**shared** 125:24**Sharika** 9:3,12**Sharon** 26:1 34:20,21,22 35:3,7,9 36:2, 19 173:15 188:20 189:1,9,21**Shaw** 11:10 19:8,17**she'd** 153:3**sheet** 202:19**Sheftal** 54:19**Shelton** 231:14**sheriff** 13:7 25:1,4,9 27:8,20,22,24 28:6, 7 30:21,22 33:3,9,15,16 35:5 37:23 41:6, 24 42:2 43:1,11,14 44:19,20,23,25 45:2, 4,5,9,14,17,22,25 46:4,9 47:4,13,17 51:19,25 57:24 58:9,10,25 59:3,7,20 64:1,2,5,8 67:24,25 68:12 78:3,14 79:10, 11,14 80:8 81:17 82:4 83:15,25 84:12,14, 15 87:11 96:20 99:18 103:13 104:1 114:13,14 118:18 123:21 146:18 148:13, 15 163:18 172:24,25 173:4 174:1,4,8,12, 16,21,23 175:1,16 176:23 177:5 178:1,18 179:20,23 180:10 181:1 189:6,24 190:5, 14 195:2 196:12,22 197:7,10,12,16 200:23,25 205:2 206:8 208:7 209:5 212:24 218:23,25 220:12,14 221:4 226:1 233:22 234:18 235:2 238:7 241:24 242:12**Sheriff's** 8:7 15:22 19:21 24:19,23 28:18 31:19 33:14 34:16 35:17 36:7 40:10 41:12 42:1,4 52:10,16,22 56:6,9,16 68:16 79:3 99:17 100:13 101:19 102:6 131:10 136:16 153:22 154:2,4 180:17 182:15 186:1 187:12 199:4 207:7 211:2,8 212:5 222:13 226:6 231:21 232:17,21 233:21**sheriff-specific** 39:15**sheriffs** 221:12**Sheriff's** 17:6 22:19,24 32:3 37:17,20, 22 38:15 39:12 41:18 43:24 49:7 50:17 54:24 57:21 98:16 105:11,16 157:21 159:12 164:24 174:9 178:18 190:18 199:11 201:11 202:5 204:3 213:11 214:25 215:14 216:6,13 224:24 227:3,9, 13 230:2,10,19 231:13,24**She's** 87:17**shift** 32:10 48:2,20,22 53:21,25 54:8 60:24,25 61:24 63:18 64:7 65:7 66:4 67:23 68:5,6,8 70:2 72:10 76:1,2 77:12 107:7 113:23 114:3,16 122:1,6 141:24 142:1 143:15 144:18,19 167:23 170:20 175:25 198:12 217:12,15,16 240:8,9,12, 13,14,15,20,22,24,25**shifts** 78:16 240:16**shit** 141:4**shook** 93:23 94:12**shopping** 56:20**short** 201:25**shortly** 27:7,13 128:17 214:4 216:18**show** 95:20 114:9 137:6 153:15,25 232:4,6**showed** 76:19,21 118:1 136:21 161:7 165:18 212:23**showing** 43:19 118:6 185:4,5**shown** 26:25**shows** 117:24 184:21**shut** 92:14 115:5,6**Shutting** 241:12**sic** 65:8 100:9 109:12**side** 61:25 81:13 109:2,5 115:12 138:22 149:10 183:25 186:15 242:9**sign** 22:14,15 28:9,20 29:19 89:25 90:5 102:18 122:11 123:6,8,10,11,12,24 124:4,5,18,19 197:16,17 209:22 211:6,23 212:8,10,18,22 214:17,19,21 230:4 237:16**signal** 86:22**signaling** 93:24**signature** 28:18,19 89:22,24 106:15 123:13,16,21 205:12 207:19 209:24 244:13**signatures** 40:2 124:7**signed** 29:1 31:7 46:7 84:15 90:2 123:15,19 124:3 211:25 212:17 214:15**significant** 120:3**significantly** 35:15 181:13**signing** 27:21 211:11 243:20**signs** 43:22 114:9**silenced** 92:15**similar** 12:20 44:4 125:18,22**simply** 58:20,21 59:18 92:14,16**sincere** 34:2**sincerity** 114:9**singing** 192:17,18**singling** 33:2**sir** 30:2 65:16 81:9 97:16 104:7 119:2 129:2**sirens** 114:1 116:12 135:16 165:15**sit** 173:2 174:6**site** 45:17**sitting** 9:23 76:13 116:7 188:20,22,23 192:18 194:9 236:5**situation** 14:1,2 36:20,25 76:8,10 84:2 86:15 97:5 110:10 113:15 115:20 129:9 139:21 144:15 151:10 154:16,18 156:15 183:19 230:13 242:1**situations** 131:14**skinny** 137:7**skip** 127:2 163:2**Skipping** 22:4**slam** 92:16 115:10 118:22**slammed** 178:2**slender** 137:8**slightly** 120:19**slow** 51:3 86:1 118:24,25 119:14**slowly** 108:25**slurs** 88:22,24 190:19 223:16,20**Smile** 192:13**sneaky** 93:9,11**snitch** 62:21**snow** 199:25**snowball** 199:21**social** 12:21 205:8 207:19**socially** 9:1

soft 13:17,18 14:7,8,12,13,18,20 151:1
158:13 164:23

somebody's 86:24 105:15

someone's 96:24

something's 219:21

Something's 62:12

song 192:11,17,18 194:11

sort 50:1

sorted 45:7

sought 17:2

sound 60:1 100:21

sounding 151:20

sounds 60:2

Soup 92:7,17,21,23,25 94:16

south 50:25 116:15 154:8 186:16

southbound 51:1

southern 12:12 27:2 86:11 116:4

spaced 139:7

spare 80:17

speak 41:25 42:2 45:6 140:15 154:20
178:21 187:10 220:17 229:6,10

speaking 38:22 43:14 46:20 71:17 92:1
146:7,16 151:25 171:23 226:16

speaks 220:5

special 40:2 212:3 215:16 227:17 229:24

specific 14:16,19 26:5 28:24 29:4 30:10
31:12 39:4,12 49:5 52:7,17 63:6 81:24
93:1 95:8 100:24 102:16 103:24 104:1
114:10 132:20,22 134:15 142:15,18
143:16 157:6 160:3 162:16 193:10
194:22 195:4 196:20 216:23 219:11,17,
24 230:12,17,21,23

specifically 15:25 17:7 49:4 91:25 96:8
99:20 100:2 165:7 215:17 224:16 234:13
239:15

specifications 31:1 52:19

specifics 30:13 167:13

specifies 79:13

speculate 41:3

sped 51:4

speed 51:5

speeding 52:5,13,18 86:25

spell 10:7 25:18 54:20

spelled 132:7

spend 56:14,22 57:14 72:12

spending 56:21

spent 72:17

spine 163:1 164:19

split 53:25 62:15

spoke 33:18 42:8 84:3 105:7,20 107:13
112:23 187:6,8 188:1 202:1,2 228:16
229:15 235:7,22 237:22

spoken 42:12 235:5

spontaneously 114:12 174:2

spray 13:19 15:11,12,14,16,17,19,21,23,
25 16:1,4,8,11,15,17,18,21 17:5,12,17
157:14,17 158:11,21 159:7,9,15,23
160:2,12 161:6,7,8

sprayed 17:18,19,20

spraying 161:5

squad 52:25 53:4,9,10,13 54:4 59:25
75:5,8,22 85:13 240:4

squads 52:23 53:4

square 202:16

squirm 153:9

SR 53:24 54:1

staff 25:5,8 175:6 180:6 220:15 221:3

stand 183:4

Standard 209:6

standing 111:24 121:5 135:17 188:23

standpoint 144:14

stands 205:15

starred 39:20

start 11:2 37:13 38:25 43:13 100:9,12
115:7 119:4,6 152:6,9 175:11 209:18

started 19:9 29:17,19 32:2,7 38:14,24
39:13 41:10,12 45:5 53:1 54:23 75:18
110:15 152:19 157:1,3,8 166:18 202:4
239:7

starting 156:25 227:21

starts 196:7

state 9:16 10:5 18:11 34:18 78:6,7 88:13
101:8,9 116:6,23 160:15 203:13 208:10
214:21 216:10 243:4,9 244:16

stated 34:11,13 36:3 44:11 47:13 50:12
57:24 58:5,8 99:15 109:16 110:14 117:10
120:25 140:2 162:10 172:23 173:12
183:1 215:23

statement 9:1 33:12,13 90:18 92:10,13
95:24 96:10 101:12 104:14,24 107:15
108:3,11 109:8,11 110:8,9 111:3,10
118:3 121:22 122:10,11,22 124:18,19
130:7,16,19 132:11 183:4 217:9 218:13
220:19,24 224:10,12,23

statements 26:24 27:1 90:7 97:8 147:14
198:14 222:1,4,8,16,18,19 223:4 238:11,
17,19 239:24

states 220:11

stating 8:21 129:7

stationary 119:25

stationed 117:3

statute 79:13 153:20

statutory 79:6,9,15

stay 30:11 51:7 56:2,4 112:2

stayed 56:24 77:13

stays 57:16

steady 157:23

step 108:16 151:7

step-by-step 162:4

stepping 22:17 162:17

steps 162:16

stock 46:13

stomping 92:15

stop 10:24 48:25 52:9 80:24 81:25 82:1,
9,18,24 86:17,21 90:23 91:4 102:17,18
103:21 105:21 106:2,12,13,14,18,19,22
110:22 111:4 119:10 128:10 183:22
184:12,24 185:17,20 233:11,17

stopped 48:24 52:17 65:2 73:14 86:4,16
102:24 105:10 118:19,20 121:13 137:12
138:3

stopping 52:13 84:19 96:2,12,15,22 121:17,21,24 122:2

stops 48:19 52:6,20 86:14 100:20 102:14,21 105:9,22,23 106:7,9 107:17 122:4,7

story 121:6

straight 151:2 162:21,23 168:24 214:3

stream 157:23

Street 131:9,15,22,25

strikes 14:11

stronger 171:4

studied 11:15

studies 12:12,15,17,19

study 11:14

stuff 31:15 40:19 45:7 49:7 67:4,13 97:9 136:12 143:7 149:6 150:3 198:16 235:25

stuns 14:11

stupid 48:12

sub-development 138:23

subject 113:10 115:19 156:19 168:11

submitted 39:18 41:4 98:18,20 106:20, 21 206:9

submitting 157:12

subordinates 115:2

Subsection 218:8

substance 87:4

substances 10:23

substantial 197:1

substantiated 205:22,24 206:3,10,19 207:24 208:20

successful 25:16 30:6

sucking 238:22

sudden 40:17,23

sue 179:3,11 180:9,18 181:10 230:10

sued 179:15,18 216:8

suffer 204:4

suffered 151:6

suggest 70:18

suing 179:14 180:13,14

summer 53:23 177:9 193:8,10,11 221:8

summon 236:25

summons 45:3 46:1,8 80:2,9,11,13,17, 20,23 81:4,6,21 82:19 83:16 85:19 88:12 90:12,24 91:5 96:3,16 100:19 110:16,19, 22,23 111:4 184:3 219:19,21 236:19,22, 23 237:5,7,9

summonses 81:17 82:2,9 83:9

super 114:15

superior 130:17

superiors 130:3,21,25

Superman 236:1

supervision 66:6 239:6 241:2

supervisor 45:10,11 51:14,17 66:18 70:2 114:15 141:13,14 142:19 143:23,24 144:3 145:16,20 241:15

supervisors 24:17 51:23 56:18 82:6 92:5 141:10 142:9 148:13 228:16

supervisory 186:9

support 184:2

supposed 83:20 173:7 175:3

surely 86:8,9,20

surety 226:6

surrounding 26:4

surveillance 118:9 128:23,24

suspect 87:3

suspended 84:13 110:11 113:1,4 115:16,17 116:22 122:20 175:22

suspension 99:8 100:5 101:24 121:18 122:9,14,21,23 196:18 197:22 238:6 242:2

suspensions 24:4 198:18

suspicion 52:8

sustaining 234:16

Sutton 235:1

swap 33:5 60:9,12

swapped 35:9

swapping 33:5

swear 80:17 237:11

swearing-in 27:9

switch 35:6,7 67:11

switching 33:5

sworn 9:16 25:10 27:1,9,12 159:19 160:23 199:4,8 243:9

symbols 199:17

system 26:25 43:20 46:21 136:18

T

T-E-R-R-Y 62:6

takedown 151:2 153:4 158:11 161:19 162:3,7 167:10,19 168:24 214:3

takes 68:15

taking 35:7 38:2 41:10 91:25 151:7 152:7

talk 22:18 32:1 47:21 55:8,20 57:18,19, 20,24 59:17,20,24 64:5 67:23 69:2 72:14 77:5 81:16 90:15 91:16 92:5 96:11 109:7, 14,23 110:6 132:17 133:15 147:17 149:16 157:4,11 168:16 185:22 187:4,14 189:22 190:14 198:24 201:6 209:3 211:12 215:16 216:23 228:11,24 229:3,4, 5,10 234:19 235:20

talked 35:3 47:22 49:20,21,23 77:4,7,8 84:8 87:10,11 95:22 97:1,9 106:17 110:1 154:17 174:3,21 180:1,2 182:5 187:17, 18,19 197:9 230:8 238:24 241:24

talking 20:19 41:21 55:13,19 59:2 61:8 74:5 81:20 93:23 110:15 112:17 113:16 114:2 135:14,16 139:25 142:14 157:10 159:13 167:3 180:23 193:20,21 199:23, 25 209:8 213:20 218:21 228:25

Tall 137:7

tape 69:7 135:11 136:21 137:20 163:25

tapes 69:5 163:8,10,16,19 164:5

tardiness 241:11

target 219:24

taser 13:20,21 18:19

taught 15:12 41:15 94:2

Taylor 231:5

teach 161:6
team 53:10
teams 52:23
teamwork 183:6,7
technique 151:1 158:13 162:22,24 164:23 168:11,19
techniques 158:7
telephone 24:13 114:6
telling 59:14 79:3 90:14 97:11 115:2 146:2 154:19 174:22 180:20 213:20 219:25 227:13 228:4 236:4
tells 79:10
temp 80:12,15
temporarily 158:3
ten 116:3 121:17 122:9,22 160:4
ten-day 122:13
term 92:17 180:12 192:17
terminate 58:10 187:11
terminated 24:6 33:1,22 39:18 57:23 58:1,3,22 59:6,15,16 98:15 99:4 101:17 180:11 181:4 188:1,11 189:25 200:5 201:1,5 206:5 209:5 213:10 221:11
terminating 180:13
termination 57:10,20 59:23 181:9,12 190:20,24 191:18 194:15 201:8 213:18 215:14
terminations 24:4 215:13
terminology 30:10 57:13
terms 14:9 16:7 30:25 36:13 37:1,12 41:17 49:5 52:16 55:25 56:19,21,23 72:15 76:2 92:25 105:15 111:9 115:14 123:25 129:13 142:18 143:16 154:12 157:6 160:4,23 162:13,16 167:5,12 180:12 182:19 183:15 184:16,22 195:22 198:14 206:3 213:2 238:1 240:6,10 242:2
Terrence 62:4
terroristic 194:20
Terry 53:14 62:4,5,10 63:4 77:1 93:3
test 26:17,18,21
testified 72:3 107:2 124:17
testifies 9:17

testify 10:21 71:18 191:11
testifying 10:24
testimony 8:16 71:13 80:18 116:7 124:17 138:5 174:16 237:12 240:1 243:12,15,20 244:5,9 245:4
text 57:1,7,18,19
texts 178:25
that's 48:22 97:21 146:3 151:15 189:14 199:10 223:6
Then-captain 25:25
then-director 39:2
thereof 243:19
there's 185:3
they're 61:6 153:19 213:1 242:5
thin 39:25 98:24 102:11
thing 19:15 66:15 97:11 99:22 113:17 133:19 144:16 157:22 171:2,11 193:18 197:2 206:4 227:6 236:20
things 16:6 27:5 31:20 32:21 35:10 40:8, 12 41:17 48:1 57:5 58:14 59:10 90:20 93:10 104:1,14 113:22 114:2 119:15 136:12 148:7 151:8,19 169:11 176:1 191:22 194:22 198:16 203:3,7,25 216:21 221:4,20 223:6,9 227:5,14 228:8,23,25 235:15 241:8,16,18
third-party 111:1 144:1
Thomas 117:1,4
thoroughness 231:18
thought 24:15 28:2 44:24 45:13 47:6,13 69:9 93:24 110:17 118:13 119:13,24 121:11 130:12,14 135:10 143:24 222:24
threat 156:17
threaten 108:21
threatened 94:7 116:20 176:23 177:1,5 208:24
threatening 111:10 181:10,14
threats 194:20
three-hour-plus 57:17
three-year 160:6
throwing 111:9
ticket 44:21,24,25 45:1,3,14 46:24 47:2,

3,5,6,7,12,14,15,19 51:21,25 79:25 80:4, 5 83:17 133:16,19 135:20,22 219:3,5 220:6,8 236:19
ticketed 220:9
time 8:4 11:18 14:16,19 15:18 16:11,14 17:24 19:9 20:4 24:12,24 32:13 35:4 38:9,12 39:23 41:23 42:18,24 43:6 46:10, 22 49:23 50:24 51:4 53:9,15,21 54:9 55:8,10,20 56:14,21,22 57:14 60:6 66:19 70:21,24 72:12,17 73:4,18,25 74:11,23 75:1,19 76:9,21 77:9 79:7 82:21 83:7,14 85:25 89:13,20 97:4,14 99:13,23 101:15, 16 104:20 105:18 106:4,25 107:3 108:21 109:21 115:9 117:12,17,18 124:23 125:1 128:1 129:21 134:25 135:24 138:13,14, 16,18 140:3,10 141:11,12 142:6,12 143:16 144:8 146:4 148:1,11 149:6,20 150:12 152:17 153:21 156:17 159:20 160:3,18 161:1,11 162:5,8 163:23 164:11 165:16,24 166:11,24 167:14 169:19 170:12,15 171:4 181:20,25 182:1 186:24 187:2,22,23,25 190:20 191:18 193:6 194:4,11,24 196:20 198:3 201:9,25 209:20 210:13,21 211:17 213:7 217:17, 23 221:8 223:8 227:18 229:6 233:7 236:5,6,11,14 238:15 241:11 242:21 243:7 244:9
times 19:23 31:18,25 48:18 50:18 55:23 56:18 72:14,21,24 73:2,17,18 76:12 85:2 88:25 95:19,23 97:5 130:14 142:5 143:13 145:14 151:5 159:22,24 160:2,5,8 169:18 174:16 176:23 177:4,6,7 182:8,9,10 189:10 196:8,9 203:23 208:24 214:19 217:23 224:13,15 244:6
timestamp 127:4,15
Tiny 93:4
tip 23:4 54:14 196:5
tissue 47:14
title 18:7 28:22 178:10
toboggan 200:1
today 10:21 21:18,25 45:11 151:17 232:4
told 16:6,20,22 21:24 24:25 25:3,6,15 26:16,18,23 27:6 28:6 29:10 30:5 32:12, 16 33:21,23 35:11 36:7 37:24 39:14 43:16,17,21,25 44:10,19 45:2,6,16 46:9, 10 50:19 51:2,6,7,19 57:22,24 58:7,11, 18,20,21,22,23 59:12,18 60:4,14,17,18

<p>61:1,11,22 62:10,16,19 63:4 64:2,20,21, 24 65:5 66:22 67:17,25 68:1,4 69:13 75:9 79:1 80:25 81:5,13 82:5,22,24 83:7,11,15 85:7,9 87:13 90:4,5 91:15,23 92:20 96:9, 11,13,19 97:5 102:23 104:11,17 105:15 106:8 112:2,6,20 121:2,5,16,20,24 124:3 127:24 130:21,25 133:16 135:6 140:17 141:1,3,16 142:19,21 143:25 145:15 149:8,21,23 150:4,17 154:21 156:11 158:23 165:14,22,25 167:9,10 172:5,8, 11,14,24 174:4 176:14,17 177:13,14,20, 22,23 178:2 180:7,21 181:17,23 182:21 186:4 188:2,17 189:6,12,16,25 190:4,5, 13,14 191:2 192:5,19 193:3 194:19 196:10 197:7,9,16 200:11,16,19,20,22 201:6 213:12 214:5,7 216:17 218:14 219:2 220:20,22,25 221:2 222:19 223:12 227:23 228:4 229:5,9,13,14 230:16 234:1,3,7,13,18 239:4</p> <p>tone 152:1,2</p> <p>tones 116:10</p> <p>tongue 23:4 54:14 196:5</p> <p>top 40:11 54:13 95:1,5 127:4 134:7,17 170:25 188:6 199:22 204:25 215:3 216:22 221:20 223:6,10</p> <p>topic 78:2 131:7</p> <p>Torrance 53:14 62:4,6,10,15,18,20 64:25 76:2,20 77:1 93:3</p> <p>totality 14:23</p> <p>touch 149:7</p> <p>touched 76:9</p> <p>traffic 42:13 43:8 46:9,10,16 48:19 49:10,13 50:2,10 51:11,13 52:6,20 78:12, 24 79:1,2,15,17,21 81:18,21,22 82:1,2, 10,18 83:8 84:25 86:14 88:12 90:12,24 91:5 94:25 95:2,5,14,16,17 96:4,7 97:10, 11 100:18,19 102:17,21 103:2,5,10,11,25 105:9,22 106:9,12,13,14,18,19,22 107:17 110:23 113:25 114:1 116:1 119:11 122:3, 6 125:10 132:4,23 137:12 183:22 184:7, 12,24 185:4,5,11,17,19,20 219:19,20 236:19</p> <p>train 16:23 32:14 161:8</p> <p>trained 13:4,5,24 15:17 16:17 17:9,10, 11 32:18 158:22 160:9,11,14,15,19,21,25</p> <p>trainee 34:12</p>	<p>trainees 32:21</p> <p>training 12:1,2,5,6,9 13:3,8,12,16 16:20,22 17:1,3,5,17 32:4,6 34:6 37:5,8 38:25 39:14 41:10,12,22 42:15 47:23 49:18,20 50:10 53:8 55:5 60:8 94:24,25 95:5 102:14,20,24 103:1 157:18,20 158:6,7,8,25 161:3,20 162:6,18,20 163:13 169:8 217:18 239:12</p> <p>transcribed 245:4</p> <p>transfer 59:24 60:3 61:3,14 63:10 64:1, 7,22 65:7,18 66:4 68:12 71:5,11,23 72:5 75:3 77:18 175:25 198:12 240:22</p> <p>transferred 11:11 23:1 59:25 60:6,16, 24 63:16,18 64:17 68:5 72:10,11 74:16 75:4,10 77:11 107:9 217:12 240:4,20,21</p> <p>transport 155:1 166:25 172:17</p> <p>trash 45:17</p> <p>treatment 231:24</p> <p>trigger 81:24 132:4</p> <p>triggered 198:17</p> <p>trooper 78:6,8 117:1,2,4</p> <p>troopers 116:6,23</p> <p>Trooper's 34:18</p> <p>trouble 43:22</p> <p>truck 137:8</p> <p>true 58:17 97:12 107:2,19 124:19 130:24 156:9 170:5,8 182:21 183:2 196:25 202:6 218:13 220:19,24</p> <p>trumped 231:17</p> <p>truth 9:16,17 60:19,22,23 131:19 243:10</p> <p>truthful 44:1</p> <p>truthfully 156:20</p> <p>tuition 232:12,15</p> <p>turn 87:14,25 89:11 104:3 117:15,21,22 118:19,21 121:8,13 125:6 128:10 129:6, 11,18 130:2,17 135:13 223:24 225:8</p> <p>turned 27:5 67:7 118:3,5,11,13,14 119:10,15 121:1,7 128:13 130:4,5,7,10, 13,14,22,25 131:1 183:20 206:15</p> <p>turning 104:19 118:1 121:12 135:15</p> <p>twisted 109:18</p>	<p>two-and-a-half 32:15 50:7 239:12</p> <p>two-year 29:8,11 232:23</p> <p>type 13:3 31:9 80:15 87:3 128:21 132:3 173:16 198:9</p> <p>typed 39:20</p> <p>types 12:22 13:24 48:25 49:19</p> <p>typo 105:7</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 10:3 231:3 240:18</p> <p>ultimate 14:10</p> <p>ultimately 68:15</p> <p>unable 16:8 21:22 30:22 31:5,22 51:10 52:19 53:25 69:12 167:5 232:25</p> <p>unbecoming 115:18</p> <p>uncertified 48:15 53:15,17,18 122:5</p> <p>uncommon 118:9 128:22 153:24</p> <p>uncooperative 15:8 152:10,22,23</p> <p>undersigned 243:16</p> <p>understand 49:9 71:11 137:23 219:23</p> <p>understood 16:14 37:7 49:18 218:23 219:25</p> <p>unemployment 19:20 39:19 40:17 41:4 58:14 133:4 222:8,17</p> <p>unfortunate 151:3 183:14</p> <p>unicorn 239:10</p> <p>unit 183:5</p> <p>university 11:10,13 12:13,14 17:25 19:9,17 27:3</p> <p>unjustifiably 225:22</p> <p>unlawfully 153:1</p> <p>unnecessary 138:8</p> <p>unpack 35:10</p> <p>unprofessional 111:8 194:21 217:24</p> <p>untruthful 140:15 205:7,9,14</p> <p>upper 104:15 123:18 153:4 162:12 168:2 170:25 206:14</p> <p>upset 44:5</p>
--	---	--

utter 114:12**uttered** 174:2

V

vacancies 23:8

Vance 8:7 15:21 16:15 17:6 19:20 22:19, 24 27:13 29:12,16 30:8,15,17 31:19 32:2, 10 37:15,17 38:15 39:11,12 41:3,17 49:6 50:17 54:24 57:16,21 98:15,19 100:12 102:25 105:11,16 116:5 117:3 131:9 153:22 201:11 202:5 203:20 204:3 207:12 210:20 211:10 212:21,23 213:11 214:25 215:14 216:6,13 224:24 227:3,9, 13,25 228:11,12,15,17 229:17 230:1,10, 18 231:9,10,13,24 235:15

VCSSO 221:11 233:10,17 235:6

vehicle 49:2 50:8 86:16 102:14 103:21 117:6 120:23 126:9 132:19 134:2,18 135:1,5 151:24,25 171:20

vehicles 106:2 121:17,21,24**vengeance** 239:17**venture** 230:24

verbal 30:16 43:13 88:9 108:9 113:19 115:14,21 116:7,24 174:15

verbally 8:15 14:5 31:2 88:8 153:13

verbatim 104:2 135:24 165:9 167:5,7 169:13

verification 22:14,15**verified** 137:2**verify** 43:20,23 44:3,6 136:19**Veronica** 69:18 70:2 72:1**versa** 240:23**versus** 8:7 20:1 65:25 110:11 145:22**vetted** 211:7 212:2**vice** 240:23

video 8:15 118:7 122:14 126:5,7,8,13,15, 24 127:1,2,3,4 128:3,4,5,12,14,20,24 130:1,15,18 131:3,6 132:3 243:6,12

videos 118:9 126:11**view** 105:11,16 209:6**viewing** 126:24**VII** 178:11**violated** 84:25 195:25**violating** 88:13 98:17 206:6

violation 49:11 52:19 80:1 81:18,21,22 95:2 96:3,23 102:17 105:9,14 137:12 157:19 177:18 185:19 205:17

violations 48:25 49:3 82:10 90:12,24 100:18 132:23 133:20 134:4,8,10,11 185:11,15 220:7

virtually 236:20**visit** 147:6,7,8 182:2,11**visited** 72:23 146:18 147:2**visitor** 112:7**volunteering** 114:25

W

Waffle 93:3**wait** 71:15 73:24 119:17,19 181:2 235:22**waited** 133:12**waiting** 48:6**waive** 8:19**Wake** 233:21**walk** 38:23 79:24 84:17 108:16 199:13

walked 24:24 25:1 92:9,11 148:25 149:12 152:3 200:21

Wallace 68:20 148:16 190:17 198:5 222:6 223:11

wanted 33:8 44:8,16,17 46:13 47:7,15, 21 51:22 58:9,25 59:5,7 75:14 110:8,9 119:16 121:12 150:1 177:12 189:9 197:8 200:15 201:4 208:18 213:10

wanting 59:2 62:8 103:12 217:24

warning 43:19 84:3,6 100:4 123:15,17 197:22 238:5 242:1

warrant 44:7 46:21 133:24 141:7 143:11,21 144:4 145:21 150:11 151:8,13 153:15,18,23,25 154:2,3,6,8 156:7,8,12 181:19,23,24 182:6,13,22,23,25 183:6,8, 10,12 186:14,16 237:1

warrants 41:16 42:13 46:16 49:21 50:5 100:19 133:1,24 137:2,11 138:2,10

139:18 140:1 141:8,10,15,17,20,21,22,24 142:2,4,19 143:9,14,15 144:16,18,22 149:9,22,23 155:25 184:1,2,3,19,25 185:25 214:1

Warren 50:4**Warrenton** 116:8**wasn't** 94:13 107:5 177:13**watch** 62:20 96:19 220:25 221:1

Watkins 26:1 58:6,8,22,23 59:14 63:22, 23 64:6 66:25 67:4,10,21 68:1,4 114:13 115:8 172:5,21,23 173:12,22,24 174:2,6, 15,19,22 180:4 187:6,8,17 188:1,15,20, 22 200:21 220:22,25

waves 115:22 116:11

Wayne 32:18,23,25 33:2,6 34:6,25 35:7, 24 36:2,3,19 37:6 53:8 54:13 61:3,12 62:9,23 64:18 65:25 66:2,3 67:1 70:6 72:12 74:7,16 101:13 103:4,14 104:8,17 202:10

Wayne's 73:5**website** 22:21**weeds** 64:12 65:2

week 29:19 32:8,12 48:15 53:2,3 57:25 61:18 69:8

weeks 32:15 50:7 60:10 68:2 94:24 99:3, 16 171:3 239:13

Welborn 117:25 120:23 121:2 122:16, 20 140:11,16,17 142:20,21 148:4,11 155:24 156:9,11 165:13,17,18 166:4,11 167:2 171:22 172:16 176:3,5 183:1,7 186:4 188:2,4 191:25 192:11 194:10,14 195:24 196:3,13,18,25 201:23 220:20

Welborn's 68:6**welcomed** 75:11**Welding** 24:12 25:25

Weldon 57:23 68:20 148:16 180:1 188:19 190:4,16 198:4,20 200:21,22 201:6 222:6 223:11

we'd 150:12 152:17**we're** 103:10 208:4

whatnot 36:16 94:8 96:22 97:4 144:13 197:17

what's 144:13 163:10

WHEREOF 243:21**whichever** 50:3 53:5,6 118:5 149:10

white 8:6,7 9:4,5,12,15,20 10:6 20:1
 25:1,4,9 27:8,24 28:6 30:21,23,24 33:9,
 15,17,18 35:5 41:24 42:2 43:1,11,14
 44:19,24 45:9,10,11 51:19 57:24 61:4,17
 62:22 63:11,14 65:25 68:12 75:2 78:3
 81:17 82:4 83:15,25 88:8,12,16 94:23
 98:6 100:18 103:2 105:8,21,24 107:16,18
 109:15 110:13 112:17,23 114:14 118:18
 120:25 121:16,18 122:9,19,23 125:6
 126:19 127:3 129:25 137:8 145:3,9
 148:13,15 155:24 156:4 172:24 174:1
 175:7 176:23 177:5 178:18 180:10 182:5
 187:3 189:24 191:24,25 192:6 195:2
 204:22 206:8 217:25 218:23,25 219:13,
 16,20 220:6,11,12,13,14,17 221:4,11,14,
 23 223:2 224:15 229:9,14 241:24 244:3

White's 22:5,6 64:1 99:18 102:14 126:9
 178:19 218:10 220:16

whites 217:5**White's** 28:18 218:23

whomever 118:20 144:12 163:22
 222:15

William 231:5**win** 179:15**winter** 200:2**withdrawal** 181:15**witnessed** 232:1 244:20

woman 88:12 111:23 147:9 164:17
 219:20 220:6

woman's 118:3**Womble** 9:22**won** 133:5 222:9

word 16:7 26:6 40:19 58:21 95:8,9,11
 111:9 114:10 163:9 190:25 191:2,5,10,
 15,22,23 192:5,20,21,23 193:1,3,13,25
 194:2,5 234:21

worded 137:19

words 88:25 91:11,21 103:24 104:2
 109:18 111:6 119:22 135:21 142:23
 167:5 219:11,17

work 12:8 14:18 27:13 29:12 30:15,17,
 25 36:15 48:7,8 49:22 50:2 56:11 62:25

66:11,23 72:13,19 75:21 76:5 80:10
 112:10 155:17 175:15 178:7 203:9
 204:10 218:15,16,17 241:11

workbook 203:9,18

worked 18:1,14 19:3,8,19 32:24 61:23
 66:16 75:16,17 159:18 212:7 223:13
 232:2 239:11 241:6

working 12:13 18:4,5 32:2 38:15 39:14
 54:23 62:13 69:24 73:13,14 94:8 100:9,
 12 113:23 160:12 188:15,16 202:5,21
 204:6,15 227:3 240:11,20,21 241:13

workplace 191:3 193:5**worried** 174:20**worries** 110:13 233:14

worry 34:1 173:1,5 174:5,11 176:15
 216:17

would've 16:12 135:4,6 164:23 198:17
 202:2 240:19,20,22

wouldn't 184:5 235:18**wow** 205:11**wrapping** 216:24

wreck 43:10 120:2 121:9,14 125:11
 129:14 130:2,4,6

write 40:7 133:16,18 172:6 202:20
 203:7,14,17

write-up 82:12,13 91:1,2 113:6 124:1
 175:21 182:4 185:13 197:19,20,23
 228:25 229:1

write-ups 66:13 198:18 229:2

writing 29:18 37:2 130:7 148:17 203:10
 239:9

written 39:20 40:1,4,13 58:17 84:3,5
 89:12 100:4 110:8,9 123:15,17 196:4,8
 197:8,21 238:3,5 242:1,3

wrong 44:14 62:5 66:20 69:13,18 88:5
 112:19 114:16 149:14 151:5 166:3,6,10
 169:18 205:9 212:15,25 213:2 219:21

wrongfully 241:20

wrote 40:3,6 82:11,13 84:11 89:20 96:10
 104:14,25 110:10 216:20 221:5

Y

yards 139:12**year** 11:10 207:9

years 28:10 29:6,12,16 30:7,12,15,17
 31:3 49:7 78:9,11 117:13

yelling 91:17,20 151:20 152:1**yellow** 85:2**young** 25:2 44:18 111:23 118:3**you'd** 237:19**you'll** 134:16**you're** 15:4 86:25 145:13

Z

Zachary 106:24**zoom** 22:14 108:1 120:19 224:4

W. Bullock – A.1 & A.2 Ethics

I. ARTICLE 1 – PRIMARY RESPONSIBILITY OF JOB

The primary responsibility of the police service and the individual officer is the protection of the people of the United States through the upholding of their laws; chief among these is the Constitution of the United States and its Amendments. The law enforcement officer always represents the whole of the community and its legally expressed will and is never the arm of any political party or clique.

II. ARTICLE 2 – LIMITATION OF AUTHORITY

The first duty of a law enforcement officer, as upholder of the law, is to know its bounds upon him in enforcing it. Because he represents the legal will of the community, be it local, state or Federal, he must be aware of the limitations and proscriptions which the people, through law, have placed upon him. He must recognize the genius of the American system of government which gives to no man, groups of men or institutions absolute power; and he must insure that he, as a prime defender of that system, does not pervert its character.

III. ARTICLE 3 – DUTY TO BE FAMILIAR WITH THE LAW AND WITH RESPONSIBILITIES OF SELF AND OTHER PUBLIC OFFICIALS

The law enforcement officer shall assiduously apply himself to the study of the principles of the laws which he is sworn to uphold. He will make certain of his responsibilities in the particulars of their enforcement, seeking aid from his superiors in matters of technicality of principle when these are not clear to him; he will make special effort to fully understand his relationship to other public officials, particularly on matters of jurisdiction, both geographically and substantively.

IV. ARTICLE 4 – UTILIZATION OF PROPER MEANS TO GAIN PROPER ENDS

The law enforcement officer shall be mindful of his responsibility to pay strict heed to the selection of means in discharging the duties of his office. Violations of the law or disregard for public safety and property on the part of the officer are intrinsically wrong; they are self-defeating in that they instill in the public mind a like disposition. The employment of illegal means, no matter how worthy the end, is certain to encourage disrespect for the law and its officers. If the law is to be honored, it must first be honored by those who enforce it.

V. ARTICLE 5 – COOPERATION WITH PUBLIC OFFICIALS IN THE DISCHARGE OF THEIR AUTHORIZED DUTIES

The law enforcement officer shall cooperate fully with other public officials in the discharge of authorized duties regardless of party affiliation or personal prejudice. He shall be meticulous, however, in assuring himself of the propriety,

under the law, of such actions and shall guard against the use of his office or person, whether knowingly or unknowingly, in any improper or illegal action. In any situation open to question, he shall seek authority from his superior officer, giving him a full report of the proposed service or action.

VI. ARTICLE 6 – PRIVATE CONDUCT

The law enforcement officer shall be mindful of his special identification by the public as an upholder of the law. Laxity of conduct or manner in private life, expressing either disrespect for the law or seeking to gain special privilege, cannot but reflect upon the police officer and the police service. The community and the service require that the law enforcement officer lead the life of a decent and honorable man. Following the career of a policeman gives no man special perquisites. It does give the satisfaction and pride of following and furthering the unbroken tradition of safeguarding the American Republic. The officer who reflects upon this tradition will not degrade it. Rather, he will so conduct his private life that the public will regard him as an example of stability, fidelity and morality.

VII. ARTICLE 7 – CONDUCT TOWARDS THE PUBLIC

The law enforcement officer, mindful of his responsibility to the whole community, shall deal with individuals of the community in manner calculated to instill respect for its laws and its police service. The law enforcement officer shall conduct his official life in a manner such as will inspire confidence and trust. Thus, he will be neither overbearing nor subservient, as no individual citizen has an obligation to stand in awe of him or his right to command him. The officer will give service where he can and require compliance with the law. He will do neither from personal preference or prejudice but rather as a duly appointed officer of the law discharging his sworn obligation.

VIII. ARTICLE 8 – CONDUCT IN ARRESTING AND DEALING WITH LAW VIOLATORS

The law enforcement officer shall use his powers of arrest strictly in accordance with the law and with due regard to the rights of the citizens concerned. His office gives him no right to neither persecute the violator nor mete out punishment of the offense. He shall, at all times, have a clear appreciation of his responsibilities and limitation regarding detention of the violator; he shall conduct himself in such a manner as will minimize the possibility of having the service of the people and the equitable upholding of their laws, whether in the handling of law violators or in dealing with the law-abiding.

IX. ARTICLE 9 – GIFTS AND FAVORS

The law enforcement officer, representing government, bears the heavy responsibility of maintaining in his own conduct, the honor and integrity of all government institutions. He shall, therefore guard against placing himself in a position in which any person can expect special consideration or in which the

public can reasonably assume that special consideration is being given. Thus, he should be firm in refusing gifts, favors or gratuities, large or small, which can, in the public's mind, be interpreted as capable of influencing his judgment in the discharge of his duties.

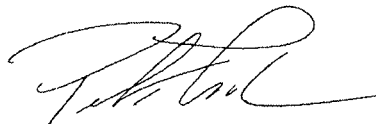
X. ARTICLE 10 – PRESENTATION OF EVIDENCE

The law enforcement officer shall be concerned equally in the prosecution of the wrongdoer and the defense of the innocent. He shall ascertain what constitutes evidence and shall present such evidence impartially and without malice. In so doing, he will ignore social, political and all other distinction among the persons involved, strengthening the tradition of the reliability and integrity of an officer's work.

The law enforcement officer shall take special pains to increase his perception and skill of observation, mindful that in many situations his is the sole impartial testimony to the facts of the case.

XI. ARTICLE 11 – ATTITUDE TOWARDS PROFESSION

The law enforcement officer shall regard the discharge of his duties as a public trust and recognize his responsibility as a public servant. By diligent study and sincere attention to self improvement, he shall strive to make the best possible application of science to the solution of crime and in the field of human relationships; he shall strive for effective leadership and public influence in matters affecting public safety. He shall appreciate the importance and responsibility of his office and hold police work to be an honorable profession rendering valuable service to his community and his country.

A handwritten signature in black ink, appearing to read 'Peter White', with a stylized, cursive script.

Peter White
Sheriff
Vance County

I. CODE OF ETHICS

As a law enforcement officer, my fundamental duty is to serve mankind; to protect lives and property; to protect the innocent against deception, the weak against oppression or intimidation and the peaceful against violence or disorder; and to respect the Constitutional Rights of all men to "Liberty", "Equality," and "Justice".

I will keep my private life unsullied as an example to all; maintain courageous calm in the face of danger, scorn or ridicule; develop self-restraint; and be constantly mindful of the welfare of others. Honest in thought and deed in both my personal and professional life, I will be exemplary in obeying the laws of the land and the regulations of my Office. Whatever I see or hear of a confidential nature that is confided to me in my official capacity will be kept ever secret unless revelation is necessary in the performance of my duty.

I will never act officiously or permit personal feelings, prejudices, animosities or friendships to influence my decisions. With no compromise for crime and with relentless prosecution of criminals, I will enforce the law courteously and appropriately without fear of favor, malice or ill will, never employing unnecessary force or violence and never accepting gratuities.

I recognize the badge of my office as a symbol of public faith and I accept it as a public trust to be held so long as I am true to the ethics of the police service. I will constantly strive to achieve these objectives and ideals, dedicating myself before God to my chosen profession...law enforcement.

A handwritten signature in black ink, appearing to read 'Peter White', with a stylized, flowing script.

Peter White
Sheriff
Vance County

W Bullock –B.6 Domestic Disturbance

I. POLICY

The purpose of this policy is to establish guidelines and procedures for deputies when dealing with domestic incidents.

The Vance County Sheriff's Office recognizes domestic incident calls as high priority and needing special attention due to the possibility of violence directed to an involved party.

II. GENERAL

The goal of the Vance County Sheriff's Office is:

- To respond to domestic related incidents without delay;
- To prevent domestic homicides through proactive measures;
- To prevent domestic assaults;
- To reduce law enforcement call backs;
- To reduce liability risk to the Sheriff's Office; and
- To prevent injuries to deputies, victims, and other involved individuals.

III. DOMESTIC STATUTES**Section 1. N.C.G.S. 50B-1****50B-1. Domestic Violence; definition**

- (a) Domestic violence means the commission of one or more of the following acts upon an aggrieved party or upon a minor child resident with or in the custody of the aggrieved party by a person with whom the aggrieved party has or has had a personal relationship, but does not include acts of self defense:
- (1) Attempting to cause bodily injury, or intentionally causing bodily injury; or
 - (2) Placing the aggrieved party or a member of the aggrieved party's family or household in fear of eminent serious bodily injury; or
 - (3) Committing any act defined in G.S. 14-27.2 through G.S. 144-27.6 (See list of statutes at the end of this policy).

- (b) For purposes of this section, the term 'personal relationship' means a relationship wherein the parties involved:
- (1) Are current or former spouses;
 - (2) Are persons of the opposite sex who live together or have lived together;
 - (3) Are related as parents and children, including others acting in loco parentis to a minor child, or as grandparents and grandchildren. For purposes of this subdivision, an aggrieved party may not obtain an order of protection against a child or grandchild under the age of 16;
 - (4) Have a child in common;
 - (5) Are current or former household members; or
 - (6) Are persons of the opposite sex who are in a dating relationship or have been in a dating relationship. For purposes of this subdivision, a dating relationship is one wherein the parties are romantically involved over time and on a continuous basis during the course of the relationship. A casual acquaintance or ordinary fraternization between persons in a business or social contact is not a dating relationship.

Section 2. N.C.G.S. 50B-2(c1)

- (c1) Ex Parte Orders by Authorized Magistrate. - The chief district court Judge may authorize a magistrate or magistrates to hear any motions for emergency relief ex parte. Prior to the hearing, if the magistrate determines that at the time the party is seeking emergency relief ex parte, the district court is not in session and a district court judge is not and will not be available to hear the motion for a period of four or more hours, the motion may be heard by the magistrate. If it clearly appears to the magistrate from specific facts shown that there is a danger of acts of domestic violence against the aggrieved party or a minor child, the magistrate may enter such orders as it deems necessary to protect the aggrieved party or minor children from such acts, except that a temporary order for custody ex parte and prior to service of process and notice shall not be entered unless the magistrate finds that the child is exposed to a substantial risk of bodily injury or sexual abuse. An ex parte order entered under this subsection shall expire and the magistrate shall schedule an ex parte hearing before a district court judge within 72 hours of the filing for relief under this subsection, or by the end of the next day on which the district court is in session in the county in which the action was filed whichever occurs first.

Section 3. Chapter 50B is amended by adding the following new section to read:

50B-4A. Violation of valid protective order is Misdemeanor.

A person who knowingly violates a valid protective order pursuant to this Chapter shall be guilty of a Class A1 Misdemeanor.

As provided for in Chapter 50B-5(a) Emergency Assistance:

- A. A person who alleges that he or she or a minor child has been the victim of domestic violence may request the assistance of a local law-enforcement agency. The local law-enforcement agency shall respond to the request for assistance as soon as practicable; provided, however, a local law-enforcement agency shall not be required to respond in instances of multiple complaints from the same complainant if the multiple complaints are made within a 48 hour period and the local law-enforcement agency has reasonable cause to believe that immediate assistance is not needed. The law-enforcement officer responding to the request for assistance is authorized to take whatever steps are reasonably necessary to protect the complainant from harm and is authorized to advise the complainant of sources of shelter, medical care, counseling and other services. Upon request by the complainant and where feasible, the law enforcement officer is authorized to transport the complainant to appropriate facilities such as hospitals, magistrates' offices, or public or private facilities for shelter and accompany the complainant to his or her residence, within the jurisdiction in which the request for assistance was made, so that the complainant may remove food, clothing, medication and such other personal property as is reasonably necessary to enable the complainant and any minor children who are presently in the care of the complainant to remain elsewhere pending further proceedings.
- B. In providing the assistance authorized by subsection (a.), no officer may be held either criminally or civilly liable on account of reasonable measures taken under authority of subsection (a).

15A-401 (b)(2)(d) provides that an officer may arrest for a misdemeanor that occurred outside his presence, if the offense was a simple assault, or domestic criminal trespass. The offense must be committed by a person who is the spouse or former spouse of the alleged victim or by a person with whom the alleged victim is living or has lived as if married.

50B – 4 (b) provides an additional option for arrest. If there is a court order in effect, 50B-4 requires arrest if there is probable cause to believe that (1) The suspect violated a court order excluding the suspect from the residence; or (2) the suspect violated the court order prohibiting him from assaulting, threatening, abusing, following, harassing or interfering with the alleged victim, and if the victim or someone acting on the victim's behalf presents the law enforcement officer with a copy of the order or the officer determines that such an order exists

and can ascertain the contents thereof, through phone, radio or other communication with appropriate authorities.

2) A "domestic incident" is when members of any relationship described above in G.S. 50B-1(b), (1) through (6) do one or more of the listed:

- a. Attempt to cause bodily injury or intentionally cause bodily injury; or
- b. Place the aggrieved person or a member of his or her household or family in fear of imminent serious bodily injury; or
- c. Commit a sexual assault; or
- d. Intentionally destroy real or personal property; or
- e. Commit domestic criminal trespass (G.S. 14-134.3); or
- f. Violate a valid court order provided under 50B; or
- g. Request law enforcement intervention even though a crime may not have been committed.

C. Probable Cause

That amount of information that would cause a reasonable and prudent person to believe that certain allegations are correct; it must be more than mere suspicion but may fall short of actual proof.

The definition and/or the weight and degree of probable cause are consistent for any incident or occurrence, and do not change.

IV. PROCEDURE

Responding

- The responding deputy(s) shall separate the parties involved, calm them and restore order, if possible.
- The deputy(s) may, if the situation allows, observe the situation for a brief period before approaching the parties. All normal precautions shall be taken during approach and upon entering any residence.
- It is important to separate the parties out of ear shot, and line of sight of each other in order that each will feel more comfortable with disclosing information without fear of retaliation.
- During discussions with the parties, deputy(s) must avoid drawing hasty conclusions.

- Whether or not an arrest is made, the deputy(s) shall provide the parties involved with information related to the problem at hand, by referring them to Community Resources for assistance.
- In cases where N.C.G.S. 50B applies, the responding deputy(s) shall inform the complainant of the availability of relief through the Clerk's office, which doesn't require an attorney.

Assessment

- In all cases, the deputy shall determine if:
 - All involved parties are safe;
 - Any injuries have occurred
 - A crime has been committed;
 - Any warrants are outstanding on involved parties;
 - Any civil process (such as 50B) is outstanding, or is in effect.

Arrest

- After the responding deputy(s) has finished his/her interviews, and weighed his/her information and observations, if grounds exist to make a warrant-less arrest as described in 15A-401 or 50B, the deputy(s) shall make the arrest.
- If the suspect has left the scene and an arrest is warranted as described in 15A-401 or 50B, the deputy(s) and the Sheriff's Office shall make a reasonable effort to locate the suspect as soon as possible, and make the arrest.
- If the suspect can not be immediately located, but there is probable cause to believe that the suspect has committed an offense, the deputy shall explain the procedure for obtaining a warrant to the victim and encourage the victim to seek a warrant. The deputy shall provide the victim with transportation to the magistrate's office if the victim so desires, or does not have transportation.
- If the suspect cannot be immediately located and there is probable cause to believe the suspect has committed an offense, but the victim refuses to get a warrant after the deputy has weighed all factors in the call, the deputy shall attempt to obtain a warrant from the magistrate on other grounds of 50B. In contemplating such a decision, the deputy will consider:
 - The existence of a protective order;
 - The history of previous calls involving the same parties;

- The likelihood that the crime will be repeated or violence against the victim continued;
- The magnitude of the victim's injuries.
- If an arrest is not made because the suspect can not be located, or due to the deputy's use of discretion to not make an arrest, the deputy shall initiate follow-up intervention with the appropriate state or county victim's services.
- The deputy shall perform a follow-up contact with the victim, in person, as soon as reasonable. If the deputy can not follow-up with the victim, he/she shall request their immediate supervisor, or on-coming duty officer make the necessary follow-up contact with the victim.
- At the discretion of the deputy, more than one follow-up contact visit may be warranted.

On-Scene

- The deputy shall remain on the scene long enough to determine if the victim will feel safe after the law enforcement leaves, or if the victim needs assistance to go to another location.
- If the victim decides to relocate, the deputy shall remain on the scene to preserve the peace, while the victim removes such items as food, clothing, medication, and other personal property as is reasonably necessary to enable the victim and/or minor children to relocate elsewhere. This does NOT include furniture or other household items.
- Unless both parties readily agree; or if there is a court order directing something else, only survival necessities may be removed with law enforcement assistance.
- Under no circumstances will the race, ethnic origin, social class or occupation of any party be factors in a deputy's initiative in handling the call, or decision to seek a warrant.

Documentation

- At the conclusion of each domestic incident call for service the responding deputy shall complete the appropriate incident report.
- Any follow-up visits by the deputy shall be documented on the appropriate follow-up report as well. The report will contain the date, time, complaint number of initial report, as well as the victim's name, address, and contact numbers. The report must also contain action taken or discussions conducted.

- The deputy responding to a domestic situation or conducting a follow up with a victim shall forward a completed copy of all reports pertaining to the incident to the Domestic Violence Coordinator or other appropriate person. All reports must be completed by the next business, unless extenuating circumstances prevents next day completion, and forwarded to the above mentioned personnel.

Additional Assistance

- If requests are made by either person involved in the domestic dispute for law enforcement assistance with removing personal belongings as described in 50 B-5, at times other than during a domestic call, the responding deputy may provide that assistance, without court order, to prevent a crime from occurring. The deputy may not intervene in any form to assist one party or another in removing household or personal items in dispute. The deputy may recommend the parties settle their property disputes in civil court. The deputy may only intervene in accordance with G.S. 15A-401, or 50B.

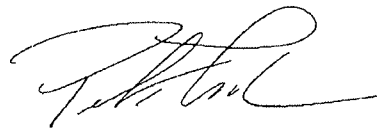
V. SAME GENDER DISPUTES

Although 50B does not address specifically, the issue of same-sex domestic incidents, deputies are reminded that domestic disputes do occur with same-sex relationships. Personnel are to treat calls of this nature the same way and using the same methods as an opposite-sex call. HOWEVER, DO NOT APPLY THE SAME STANDARDS FOR EX-PARTE ORDERS UNDER 50B IF MAKING A WARRANTLESS ARREST

VI. ASSISTING LEGISLATION

- North Carolina General Statute:
 - 15A-401 Arrest by law enforcement officer.
 - 15A-401(b)(2)(d) Warrant-less arrest powers of officers responding to domestic violence.
 - 50B-4(b) Arrest mandated when officers responding to domestic violence in some cases.
 - 14-27.2 First-degree rape.
 - 14-27.3 Second-degree rape.
 - 14-27.4 First-degree sexual offense.
 - 14-27.5 Second-degree sexual offense.
 - 14-27.6 Penalties for attempt.

- 14-33 Misdemeanor assaults, batteries, and affrays, simple and aggravated; punishments.
- 14-33.1 Evidence of former threats upon plea of self-defense.
- 14-277.3 Stalking
- 14-27.2 through 14-27.7 Committing or attempting to commit sex offenses.
- 14-134.3 Domestic Criminal Trespass.
- 15A-285 Allows for entry when an urgent necessity exists, when an officer reasonably believes entry is necessary to save a life or prevent serious bodily injury.
- Chapter 50B Domestic Violence.
- 50B-1 Domestic violence; definition.
- 50B-2 Institution of civil action; motion for emergency relief; temporary orders.
- 50B-3 Relief.
- 50B-4 Enforcement of orders.
- 50B-5 Emergency assistance.
- 50B-9 Domestic Violence Center Fund.



Peter White
Sheriff
Vance County

W Bullock – B.8 Treatment of Prisoners

I. POLICY

This policy establishes guidelines, procedures for deputies and other personnel with regards to the treatment of persons in and out of custody. It shall be the policy of the Vance County Sheriff's Office to take the precautions necessary while transporting prisoners to protect the lives and safety of personnel, the public, and the person taken into custody. All persons under arrest or in custody shall be searched and handcuffed prior to transportation.

II. TREATMENT OF PERSONS IN CUSTODY

Personnel shall not mistreat persons who are in their custody. They shall handle such persons in accordance with established Sheriff's Office procedures, applicable laws, and regulations.

III. VEHICLE STOPS

- Vehicle stops may be based on any of the following:
 - Probable cause to believe that a crime or traffic violation has occurred or is about to occur
 - Reasonable suspicion that a crime or traffic violation has occurred or is about to occur (Deputies must be able to articulate their suspicions)
 - In connection with a lawfully conducted checking station

IV. FOOT PURSUIT (JUMP AND RUN)

If a suspect jumps and runs the escape must be reported immediately to the Vance Central. The reporting deputy/personnel shall give a physical and clothing description of the suspect, the location of the jump and run, any weapon information, and the last known method and direction of travel. Vance Central personnel shall promptly dispatch information concerning the escape to the other deputy patrols, and affected law enforcement agencies (i.e. Sheriff's Department, Police Department, the North Carolina Department of Corrections, or the North Carolina State Highway Patrol).

The safety Vance County Deputies is paramount in these circumstances. A deputy may not pursue a suspect on foot prior to contacting Vance Central and providing the required information and request back-up.

If the escapee is not apprehended, the affected deputy may have the violator's vehicle towed and stored (if applicable), only when authorized by law and Sheriff's Office policy.

V. DETENTION

Motorists stopped for investigation of routine criminal or traffic violations may be detained for a reasonable period of time sufficient to conduct those duties normally associated with traffic stop investigations. Such investigations include, but are not limited to; checking the status of the driver's license, vehicle registration, vehicle identification number (VIN), completing any related paperwork, and use of a Canine Team to conduct a vehicle sniff for controlled substances or other contraband.

Deputies shall not conduct violator/suspect interviews in the patrol car unless extenuating circumstances exist. Violator/suspect interviews shall be conducted with the violator/suspect seated in his/her own vehicle or in a safe location outside the patrol vehicle. Deputies shall not check the status of a violator's/suspect's license and registration, or make any criminal inquiries while the violator is seated in the patrol vehicle unless the violator/suspect is properly handcuffed as described in Section X below. Exceptions may be made during minor traffic, or criminal violations during inclement weather or when the violator/suspect is elderly, frail or has an obvious medical condition that necessitates an accommodation.

If a deputy determines that, under the circumstances, it is necessary to handcuff a violator/suspect or vehicle occupant prior to determining whether an arrest is warranted, the deputy shall inform the violator/suspect or occupant that he/she is not under arrest and that he/she is being temporarily detained and handcuffed for his/her own safety and for the safety of the deputy. The violator, vehicle occupant, or other suspect(s) shall be handcuffed with his/her hands behind his/her back as more fully described in Section X below.

VI. INTERROGATION

Deputies shall be thoroughly familiar with and comply with all Federal and State Laws, and Regulations as it relates to the interrogation of suspects.

Violators/suspects are not normally considered to be "in custody" for Miranda purposes during an investigative stop. Accordingly, deputies are not normally required to give Miranda warnings prior to formally arresting or apprehending a violator/suspect. If a violator/suspect is handcuffed for any reason, he/she should not be questioned or otherwise interrogated without first being given Miranda warnings; this includes a suspect who is handcuffed during detention for the safety of the officer.

VII. VEHICLE / PROPERTY SEARCHES

Consent Searches

- Voluntary consent to search by the owner/operator of the vehicle, other owner of property confers authority to conduct such a search. Consent to a search

must be voluntary and freely given rather than a mere submission to expressed or implied authority, duress, or coercion. Although consent to search need not, as a matter of law, be written, deputies shall in accordance with this policy, attempt to obtain written consent whenever practical. In those cases where an individual indicates a willingness to consent to a search of the vehicle but desires not to sign the Consent to Search form, the deputy shall document the verbal consent on the Consent to Search and proceed with the vehicle/property search. In all cases where a consent search is conducted, a copy of the Consent to Search shall be furnished to the person consenting to the search. Once consent to search is obtained, deputies shall, as expeditiously as possible, either confirm or dispel their belief that controlled substances or other contraband are present in the vehicle or at the property in question. In no case shall any person or vehicle be detained for a period of time longer than is reasonably necessary under the existing circumstances. When searching for a controlled substance, whenever available, a Canine Team will be requested to assist in the search of the vehicle/property unless use of the Canine Team would delay rather than expedite the search. While conducting a vehicle/property search, deputies shall, at all times, treat the motorists/suspect in a courteous and considerate manner and provide for their comfort and safety. Prior to conducting any vehicle/property search where there is a potential safety threat, or multiple occupants or persons at the property, the deputy shall contact Vance Central and request the assistance of another deputy or an officer from another law enforcement agency.

Probable Cause Search

- Deputies may search a vehicle if he/she has probable cause to believe controlled substances, contraband or other evidence of criminal activity will be found in the location searched.

Search Incident to Arrest

- Deputies shall search the entire passenger compartment of all vehicles incident to the arrest, if any occupant of the vehicle is arrested. The only exception to this policy is when the safety of the deputy(s) and prisoner(s) is in jeopardy due to extenuating circumstances.

Vehicle Frisk

- Deputies may frisk the passenger compartment of a vehicle for weapons with the consent of the driver or other person having lawful possession of the vehicle, or when the deputy has a reasonable suspicion to believe there may be a dangerous weapon(s) concealed in the passenger compartment of the vehicle. (The deputy must be able to articulate their suspicion)

VIII. SEARCH OF PERSONS IN CUSTODY OR UNDER ARREST

Deputies may frisk or search persons in accordance with the Constitution, State law, regulations, and this policy. A canine shall never be utilized to conduct a sniff of a person for controlled substances or other contraband.

Persons who are detained may be frisked for weapons provided the deputy either obtains consent from the person to be frisked or has a reasonable suspicion to believe the person being frisked may be armed and dangerous. Consent to search a vehicle does not authorize a deputy to frisk the occupants of the vehicle. (The deputy must be able to articulate their suspicion).

Deputies may search detained persons with their consent or if the deputy has probable cause to believe contraband or other evidence will be found.

Deputies shall search all prisoners incident to arrest prior to transporting and take possession of all weapons and/or evidence. The only exception to this policy is when the deputy(s) and prisoner(s) safety is in jeopardy due to extenuating circumstances.

Deputies shall search any prisoner whose custody is turned over to them by another deputy or law enforcement officer from another law enforcement agency.

Search of Prisoners of the Opposite Sex:

- A deputy shall search a prisoner of the opposite sex only when an immediate search is necessary to ensure the safety of the prisoner, deputy, or others or to preserve evidence which otherwise might be destroyed. If a deputy of the same sex as the prisoner is not available, only a pat-down search will be conducted unless circumstances warrant an immediate, thorough search.
- A pat-down search may be delayed until the arrival of a second officer. If a second officer is not available and/or there is a safety issue, the pat-down search will not be delayed.
- Searches made under such conditions shall be made with all possible regard for decency and a witness should be present.

Strip and Body Cavity Searches

- The use of strip and body cavity searches may under certain conditions be necessary to protect the safety of deputies, civilians, and other prisoners; and to detect and secure evidence. Such searches shall be conducted only with proper justification and in accordance with the procedural guidelines for conducting such searches as set forth in this policy, and with the approval of the Sheriff.
- Strip searches are defined as any search of an individual requiring the removal of all clothing to permit the visual inspection of skin surfaces

including genital areas. Strip searches may be conducted only by law enforcement or other personnel of the same sex as the person being searched and under conditions that provide privacy from all but those authorized to conduct the search.

- Field strip searches of a suspect may be conducted only if there are exigent circumstances and the deputy has probable cause to believe that the life of the deputy or another may be at risk, or evidence will be lost if the strip search is not performed. If a field strip search is conducted, it must be done discreetly and out of the view of the public. All strip searches shall be documented as follows:
 - If evidence is found as a result of a strip search, it shall be documented on the appropriate Seized Property Report
 - If no evidence is found as a result of a strip search, the deputy shall complete an incident report detailing the strip search, which is submitted to the deputy's immediate supervisor. This report shall be retained in the appropriate file at the Sheriff's Office for one (1) year or for a length of time at the discretion of the Sheriff for record keeping purposes only.
- If a deputy believes a strip search is necessary to locate contraband and the person under arrest will be committed to a jail, the deputy may choose to inform the jail personnel of potential contraband and allow them to perform the strip search as part of jail procedures.
- Body cavity searches are defined as any search involving not only visual inspection of skin surfaces, but also the internal physical examination of body cavities, such as the rectal or vaginal cavity.
- Should visual examination of a suspect during a strip search and/or other information lead the deputy to have probable cause to believe that a suspect is concealing a weapon, evidence, or contraband within a body cavity, the following procedures shall be followed:
 - The deputy shall consult with his/her immediate supervisor to determine whether probable cause exists to arrest the subject and seek a search warrant for a body cavity search. A subject can consent to a body cavity search by medical personnel.
 - A body cavity search shall be performed pursuant to a search warrant or consent by a physician or other medically trained personnel at the physician's direction. Only a law enforcement officer or other personnel of the same sex as the person being searched shall be present when the search is conducted.
 - Body cavity searches shall be performed with due recognition of privacy and hygienic concerns.

- The authorized medical personnel conducting the search shall furnish a copy of his/her report to the deputy serving the search warrant.

IX. PROPERTY OF PRISONERS

Deputies shall take all reasonable measures to protect the personal property in the possession of prisoners at the time of arrest or detention.

When a deputy stores or takes possession of a vehicle containing a domesticated animal or arrests an individual that has a domesticated animal in his/her possession, the deputy shall make reasonable efforts to ensure the safety and wellbeing of the animal. Reasonable efforts may include contacting the animal's owner or an immediate family member of the owner. If these efforts fail, an animal shelter or an animal control officer should be contacted to remove the animal.

X. SECURITY AND TRANSPORTATION OF PRISONERS

Positional Asphyxiation

- Positional asphyxiation may occur when the position of the body interferes with respiration. The deleterious positional effect may result from either interference with the muscular or mechanical component of respiration or both. Medical evidence has shown in all cases of positional asphyxia that one or more contributory factors provide an explanation for the inability of the victim to correct the injurious and potentially lethal position; for example, alcohol/drug intoxication, concussive head injury, entrapment, restraint or physical disability.
- An arrestee who engages in strenuous physical activity while intoxicated or under the influence of drugs and is then placed facedown for any reason will possibly suffer death. The facedown position prevents adequate breathing because the abdomen chest walls and diaphragm muscles are hyperextend or otherwise prevented from functioning normally due to the arrestee's prone position. The combination of these factors can lead to a fatal inability of the arrestee to breathe.
- Deputies shall not transport anyone in a facedown prone or facedown bound (hog-tied) position. Deputies experiencing an arrestee who may be uncontrollable requiring them to be restrained and transported shall ensure the person is properly seated. If the person transported must be restrained by being bound or strapped down with plastic ties, it is the arresting deputy's responsibility to ensure the person is not placed in a facedown position.

Procedures

- Prior to transportation, deputies shall handcuff all persons under arrest or in custody regardless of the charge (If a deputy's safety is threatened, the deputy may transport a prisoner to a safe location prior to handcuffing).

Prisoners are to be handcuffed with their hands behind their backs, with the cuffs only tightened to the extent necessary to prevent escape and “double locked”. Prisoners are not to be handcuffed to any part of the vehicle (deputies may use discretion in handcuffing a violator with the hands in front if there is a compelling reason such as obesity, physical, or other condition that precludes applying the handcuffs behind the violator’s back). Restraining measures in addition to handcuffing may be necessary when dealing with combative persons (e.g. flex-cuffs, leg-irons, or full hand-leg restraints) may be used as restraints and should be applied in the proper manner.

- Suspects should always be handcuffed in a safe location outside the deputy’s patrol vehicle.
- In extraordinary circumstances, deputies may use their discretion to make exceptions to the handcuffing policy. These exceptions may include the sick, injured, disabled, handicapped, elderly, or other persons whose physical condition may be aggravated by handcuffing. Sound professional judgment should be used when exceptions are made and alternate safety precautions should be taken to guard against injury and/or escape. When possible do not handcuff parents in front of their children.
- Physically or mentally handicapped persons require special care and attention. Deputies shall use their own discretion in determining what, if any, restraining devices will be used on handicapped prisoners and whether or not a patrol vehicle is appropriate for transporting purposes. Deputies should request the assistance of EMS, or the appropriate city or other law enforcement agency when it becomes necessary to transport a person suffering for a mental illness.

The transportation of prisoners is a constant and frequent activity with a potentially high degree of violent confrontation requiring appropriate safety and security measures.

- Deputies shall examine their patrol vehicle at the beginning of each shift to assure that it is safe, properly equipped, and free of weapons or evidence. An additional search shall be completed immediately after transporting a prisoner(s) or other person(s), including under the seats, to ensure that no weapons are accessible and that no weapons or evidence was left in the vehicle.
- When transporting a prisoner of the opposite sex, two deputies will be used when available. When only one deputy is available, Vance Central shall be notified and provided the description of the prisoner, location, destination, and odometer reading. Upon arrival at the intended destination, the deputy will repeat the odometer reading and location.
- Deputies operating patrol vehicles shall transport all prisoners in the rear seat, behind the prisoner transport partition. It is strongly recommended that one deputy not transport more than two (2) prisoners. When it is necessary

to transport more than two (2) prisoners the arresting deputy will request a second deputy to assist. Both prisoners shall be handcuffed and the seat belts fastened.

- The safety belt will be applied and the door locked to secure the prisoner. Restraining devices will be used on all prisoners when physically possible. Mental patients, sick, injured, or handicapped persons will be restrained in the deputy's patrol vehicle or other provisions shall be made for transportation in an ambulance.
- Communications by the prisoner with persons other than the transporting or arresting deputy will be restricted until the prisoner has reached the booking location. Under no circumstances will the prisoner be allowed out of sight of the arresting or transporting deputy. If a deputy must leave the vehicle, the keys will be removed from the vehicle.
- A transporting deputy should only stop or respond to law enforcement needs, when the risk to third parties is clear and grave and the risk to the prisoner is minimal. Deputies shall not engage in any extraordinary vehicle operation, such as vehicle pursuits, while transporting prisoners unless a life-threatening situation occurs, and after approval of the shift supervisor.
- If a prisoner being transported escapes from custody, the escape shall be reported immediately to the appropriate shift supervisor and Vance Central. The reporting deputy shall give a physical and clothing description of the prisoner, the location of the escape, any weapon information, and the last known method and direction of travel. Vance Central personnel shall promptly dispatch information concerning the escape to other law enforcement patrols and affected law enforcement agencies (i.e. Sheriff's Department, Police Department, the North Carolina Department of Corrections, or the North Carolina State Highway Patrol).
- If the escapee is not apprehended, the affected deputy shall consult with the Magistrate to initiate any criminal proceedings. The patrol shift supervisor shall document the facts of the escape and any pertinent follow-up information he/she deems necessary on an incident report.
- Prior to entering any detention facility, deputies shall secure their duty firearm, ammunition and asp in accordance with the rules or guidelines established by the detention facility, the Sheriff, or in the trunk of the deputy's patrol vehicle.
- Prisoners turned over to detention personnel become the detention center's responsibility and deputies are free to resume duty after completing the required booking procedures and any other required paper work. However, deputies shall notify the detention facility or court deputy/bailiff when a prisoner turned over to their custody is a security risk.

Handcuffs are not to be removed from arrestees until they are delivered to the detention facility unless the following exceptions apply:

- Handcuffs may be removed upon entry into a secure location
- Handcuffs may be temporarily removed at other locations:
 - When necessary during medical treatment
 - When performing psychophysical tests for driving while impaired (DWI)
 - Other purposes deemed necessary by the arresting officer

Handcuffs should be removed only until the necessary function is completed. If the subject is combative, the handcuffs shall not be removed and test(s) omitted. Deputies shall advise detention facility personnel of any potential medical or security hazards.

Deputies shall consider their safety and that of the passenger(s) when deciding upon the transportation of authorized passengers (e.g. crime victims, stranded motorists, witnesses, or other persons required in the line of duty) in a patrol vehicle.

The transportation of a passenger and a prisoner at the same time is discouraged. If the situation requires transport of a passenger while transporting a prisoner, the deputy shall exercise every reasonable precaution to ensure his/her safety, the safety of the prisoner, the passenger, and other users of the highways. Prior to making the decision to transport a prisoner and a passenger at the same time, the deputy should call another officer for assistance.

Security and Control of Prisoners Transported to Medical / Mental Health Facilities

- Prisoner custody and well being is solely the responsibility of the arresting deputy. If a prisoner becomes sick or is injured incidental to the arrest, the deputy will immediately seek medical attention through Vance Central. The deputy shall be governed by the decision of the Emergency Medical Services personnel regarding the need for hospitalization. The deputy shall remain with the prisoner unless urgent medical circumstances exist or relieved by a patrol shift supervisor. In the event the prisoner is admitted to the hospital, the deputy shall contact the patrol shift supervisor concerning additional security measures with the assistance of on duty deputies. When it becomes necessary to transport a prisoner to a mental health facility for the purpose of treatment or evaluation, the arresting deputy must secure an "Involuntary Commitment Order" from the Magistrate's Office prior to the prisoner being transported. The arresting deputy shall request assistance from EMS or the appropriate law enforcement agency when transporting a mentally ill prisoner pursuant to an Involuntary Commitment Order. In the event the mentally ill prisoner requires additional security, the arresting deputy shall be responsible to ensure that the prisoner is transported to a facility that is equipped and

staffed, to accommodate the additional security measures request, after consulting with the patrol shift supervisor.

XI. MONITORING A PERSON'S PHYSICAL CONDITION

The physical and mental condition of the prisoner must be monitored during the time that he/she is in the deputy's custody. A prisoner who appears to be sick or injured must be provided medical attention from medical personnel.

When a deputy arrests a person who is unconscious, semiconscious, or otherwise apparently suffering from some disabling condition, and who is unable to provide information on the cause of their condition, the deputy shall make a reasonable effort to determine if the person is wearing a Medic Alert bracelet or necklace containing the emergency alert symbol indicating a condition or illness which could cause loss of consciousness. Upon finding such a symbol, the deputy shall make a reasonable effort to obtain the appropriate medical care for the individual.

A prisoner who exhibits any of the following characteristics must be taken for immediate medical attention:

- Loses consciousness (this does not include an obviously intoxicated person who goes to sleep)
- Sweats profusely without reason
- Appears very sick
- Engages in deranged or irrational conduct or speech without any obvious reason, such as impairment from alcohol or drugs
- Has an obvious injury
- Complains of significant injury or illness and requests medical attention

A prisoner who exhibits any of the following characteristics must be particularly monitored for potential physical problems:

- Old or frail
- Known diabetics or asthmatics
- Have a known history of heart or lung problems or seizure disorder
- Are substantially impaired by drugs or alcohol
- Have run or fought with officers or violently resisted arrest

- Are breathing very rapidly, sweating heavily, or exhibiting pale skin
- Engage in deranged or irrational conduct or speech
- Are very obese
- Complain of health problems

XII. HANDLING THE MENTALLY ILL

Recognition

- Deputies may occasionally be called upon to control or restrain an individual when mental illness provokes anti-social behavior. Suicide attempts, violent behavior, imaginary persecution, hallucinations, illusions of grandeur, and other deviations from what is considered normal or expected behavior are indications of mental illness. Careful observation of the victim, including how he/she talks, what he/she says, and how they behave can lead you to believe they are suffering from some type of mental illness. This visual observation may also be supplemented by information obtained from friends or relatives of the victim. The information gathering process will be a great aid on how to handle the situation. Some specific indicators to look for and note are:
 - Determine if Injured or Ill – Is the person physically ill or injured? There are a great many physiological reasons that can cause a person to act abnormally. A blow to the head, a high fever, shock from a crash or reaction to medication can cause a person to appear disoriented. On the other hand, a person who is mentally ill may not react to pain as we would expect a normal person to react. If there is an injury and first aid is required, do what you can for the person, but do not force treatment unless it involves a life-threatening situation.
 - Obtain Past History – Attempt to learn as much as possible about the past history of the person. Have they previously been confined? If a past record of mental illness is discovered, they should be returned to the institution where they were treated or their attending physician should be contacted.
 - Consider Hospitalization – When a deputy feels that a person should be hospitalized due to mental illness, the local mental health facility shall be contacted. Necessary arrangements can be made for evaluation and commitment to the nearest state hospital or medical facility for treatment or detention. The deputy must feel that the person is a risk to themselves or others.
 - Identify Any Criminal Behavior – Has the person committed a crime? If a crime has been committed, especially a felony, the magistrate should be contacted for advice. The past record of the person and the willingness of the hospital to accept him/her will have some direct bearing on this

problem. In any case, the person must be removed from contact with the community until he/she can be stabilized. If a felony has been committed, the deputy has the responsibility to guard the person until secured, either in a mental facility or a jail. It still remains a function of the court to determine guilt, innocence or insanity.

General Guidelines

- **Be Sympathetic** – Do not argue or antagonize the person. Most likely they will not respond to logical arguments. Take your time, keep cool and use a quiet conversational tone of voice when dealing with them. The tone of voice, more often than the words spoken, will have a great influence on the person. You must try to convince them that you are on their side and are there to help them.
- **Avoid Physical Contact** – Do not touch them unless it is absolutely necessary. The mentally ill person may be inclined to interpret this as an attempt to restrain him and overreact.
- **Do Not Mislead** – Do not mislead or try to trick a mentally ill person. It may work for you temporarily, but can cause more serious problems later.
- **Use Available Assistance** – It may be necessary to summon medical assistance and have the person sedated if he/she is exceptionally violent. Obtain assistance whenever possible. It is always best to call for assistance from another officer even if things appear to be normal. A friend or relative may be most valuable in controlling the person. Any person that appears to agitate the mentally ill person should be removed from the scene as soon as possible. Deputies should contact EMS or the appropriate law enforcement agency for assistance when a mentally ill person requires transportation to a treatment facility if necessary.



Peter White
Sheriff
Vance County

W Bullock – B.9 Use of Force

I. POLICY

This policy establishes guidelines related to the use of force, reporting, review, and analysis.

The Vance County Sheriff's Office recognizes and respects the value and special integrity of each human life. By vesting deputies the lawful authority to use force to protect the public welfare, a careful balancing of all human interests is required. Therefore, it is the policy of the Vance County Sheriff's Office that deputies shall use only that force which is reasonably necessary to effectively bring an incident under control while protecting the lives of the officer or another. Deputies shall use physical force in arrest and custody situations only in strict conformance with the United States Constitution, laws of North Carolina, and this policy.

Approved Weapons

- A deputy shall, while on or off duty, only carry weapons and ammunition authorized or approved by the Sheriff.

Impact Weapons

- The riot and expandable (ASP) batons are the only impact weapons issued to deputies of the Vance County Sheriff's Office. Deputies must complete the appropriate training prior to receiving authorization to carry or use these weapons.

Chemical Agents

- Only Sheriff's Office issued chemical agents may be carried and used by deputies of the Vance County Sheriff's Office.
- Prior to the issuance of Oleoresin Capsicum Spray (OC Spray), all deputies shall receive training in its use, which will include instruction and actual application to afford the deputy an understanding of the effects. Any use of OC Spray other than in a training situation or spraying of animals for self-protection shall be reported as required by this policy.

Use of Other Chemical Agents

- Authorization to employ tear gas or other chemical agents in riot situations or for other applications involving large numbers of people must be obtained from the Sheriff's Office Captain or higher authority or his/her designee. Any use of tear gas or chemical agents except in a training situation must be reported on the appropriate Incident Report.

Electronic Control Device (ECD)

- Prior to the issuance of an electronic control device, all deputies shall receive training in its use, which include demonstration and application to afford the deputy an understanding of the effects. Any use of an electronic control device other than in a training situation shall be reported as required by this policy.

Issuance of Authorized Weapons

- Prior to the issuance of any lethal or less than lethal weapon, the Sheriff's Office Operations Lieutenant, Armorer, Captain, or Firearms Coordinator shall review, inspect, and approve all weapons intended for use by deputies in the performance of their duties. Any weapon found to be unsafe shall be removed from service until such time it is repaired by a qualified technician. A record of each approved weapon issued by the Sheriff's Office shall be maintained by the Vance County Sheriff's Office Armorer.

Issuance of Specialty Firearms

- Prior to the issuance of any specialty firearm to a deputy, the Sheriff's Office Armorer or his/her designee shall conduct a pre-qualification pistol proficiency examination and an Internal Affairs review shall be requested of any prospective Specialty Firearm candidate alleging excessive force. The minimum duty handgun proficiency required to be considered for further participation and training is at least 80%. Specialty Firearm training and qualification shall also require completion with a score of at least 80% proficiency. Rifle candidates shall complete the approved Rifle Operators Course with a qualification score of at least 80% proficiency.

Use of Weapons

- Weapons shall be used in accordance with the deputy's training and Sheriff's Office policy. Careless or imprudent use of weapons is prohibited. The term deadly is synonymous with lethal and the term non-lethal and non-deadly are synonymous with less than lethal.

Remedial Training

- A deputy who fails to demonstrate required proficiency with either a lethal or non-lethal weapon shall receive remedial training with said weapon by a certified weapons instructor prior to resuming official duties.

II. DEFINITIONS

Display of Firearm. Displaying the weapon includes the removal of the pistol or the pointing of any firearm at a suspect in order to control a situation. Displaying of the weapon does not include removal of the pistol while conducting a building

search, executing a search or arrest warrant or other non-traffic enforcement situation where no subject is located or controlled by the use of the firearm.

Lethal Force. The application of any instrument or technique which is likely to produce death or serious physical injury under the circumstances of its use. Such instruments include, but are not limited to: firearms, blackjacks, flashlights, riot batons, nightsticks, knives, or automobiles.

Serious Bodily Injury. Bodily injury that creates a substantial risk of death or is likely to cause permanent disfigurement, coma, protracted, or permanent condition. It is an injury that causes extreme pain, prolonged or permanent loss or impairment of the function of any bodily member or organ that result in prolonged hospitalization.

Use of Firearm. Discharging the weapon (i.e. pistol, shotgun, rifle, etc.) or using it as an impact weapon.

III. USE OF LETHAL FORCE

General Guidelines

- Deputies shall use **lethal** force only in conformance with the Constitution and laws of North Carolina.
- **Imminent** shall be synonymous with the term immediate.

General Statute § 15A-401(d)(2) states, in pertinent part:

A law-enforcement officer is justified in using deadly physical force upon another person only when it is or appears to be reasonably necessary thereby:

- To defend himself or a third person from what he reasonably believes to be the use or imminent use of deadly physical force
- To effect an arrest or to prevent the escape from custody of a person who he reasonably believes is attempting to escape by means of a deadly weapon, or who by his conduct or any other means indicates that he presents an imminent threat of death or serious physical injury to others unless apprehended without delay

Nothing in this subdivision constitutes justification for willful, malicious, or criminally negligent conduct by any person which injures or endangers any person or property, nor shall it be construed to excuse or justify the use of unreasonable or excessive force.

Warning Required

Prior to using lethal force, deputies must give a verbal warning if feasible.

IV. USE OF LESS THAN LETHAL FORCE

General Guidelines

Where **lethal** force is not authorized, a deputy should assess the situation in order to determine which less than lethal technique or weapon will best de-escalate the incident to bring it under control in a safe manner.

A deputy is authorized to use agency-approved less than lethal force techniques, issued equipment, and/or canine for resolution of incidents as follows:

- To protect the deputy or another from physical harm
- To restrain or subdue a resistant individual
- To bring an unlawful situation safely and effectively under control
- To effect an arrest or prevent escape from custody of a person whom the deputy reasonably believes has committed a criminal offense unless the deputy knows the arrest is not authorized

The amount of force, which may be used in attaining a lawful compliance, will be determined by the surrounding circumstances, including but not limited to:

- The nature of the offense
- The behavior of the subject against whom force is to be used
- Actions by third parties who may be present
- The feasibility or availability of alternative actions

Deputies are not permitted to use a less than lethal defensive weapon unless qualified in its proficient use as determined by training procedures. All proficiency training must be monitored by a certified defensive tactics instructor. All deputies authorized to carry weapons are required to receive in-service training at least annually on the agency's use of force policies and demonstrate proficiency with all approved lethal and less than lethal weapons including any restraint techniques that deputies are authorized to use. In-service training for lethal and less than lethal weapons will be documented either on the deputy's training record and/or on a Firearms Qualification Record (F-9A).

The following less than lethal defensive weapons are authorized for on and off duty use, expandable baton, riot baton, O.C. Spray, and other weapons which may be issued by the Sheriff's Office. Under **no** circumstances are deputies authorized to carry an electronic control device (ECD) while off duty. All personnel will follow proper reporting procedures as outlined in Section VIII of this policy).

V. MEDICAL ASSISTANCE

Deputies shall make the scene as safe as possible and shall afford medical assistance to injured persons considering:

- Amount and type of force used
- Any apparent or probable injuries
- Statements made by the person(s)

Medical assistance afforded shall be the same as for any other individual with similar injuries including:

- First aid administered by the deputy within the limits of the affected deputy's level of training
- Calling or offering to call emergency medical services as appropriate

Deputies may elect to transport injured suspects by patrol vehicle to a medical facility for examination or treatment based on potential security risks, danger presented by the suspect, and other explainable facts.

VI. ADMINISTRATIVE LEAVE AND REVIEW

Deputies whose actions or use of force results in a death or serious physical injury to anyone shall be removed from their normal duty assignment and assigned Administrative Duties by their Division Commander pending an administrative review. The Division Commander who places the affected deputy on Administrative Duties shall follow-up in writing in the form of a memorandum outlining the reason for the Administrative Duties and the deputy's limitations while on Administrative Duties. The memorandum shall be completed no later than the first scheduled workday after placing the deputy on Administrative Duties. The memorandum shall be immediately forwarded to the Sheriff's Office Captain. Administrative leave is not limited to shootings but shall include actions or uses of force, which result in a death or serious injury.

A supervisor shall order a deputy to take a drug test to eliminate the possibility that drug use may have affected the deputy's actions or judgment in any case where the deputy:

- Discharges his/her weapon resulting in bodily injury to himself/herself or another
- Is involved in a fatal motor vehicle collision
- Is involved in a motor vehicle collision which results in an apparent serious bodily injury

A deputy on Administrative Duties **may** be required to surrender his/her issued patrol vehicle, firearms, uniform badges, and identification credentials.

A deputy assigned Administrative Duties may not wear a uniform or drive or ride as a passenger in an assigned patrol vehicle to and from the work place. The deputy shall be responsible for providing personal transportation to and from the work place. Upon the approval of the appropriate supervisor, the affected deputy may be transported to a doctor's appointment, court, meal break, or any other administrative function. At **no time** will a deputy assigned Administrative Duties be allowed to ride as a passenger in an authorized patrol vehicle during non-work hours. Suitable business attire must be worn and all regulations in this manual must be complied with when performing these assignments. A deputy's Administrative Duties assignments shall not include enforcement action.

Deputies who are involved in any critical incidents shall be referred to a Licensed Physician, approved by the Office of the Sheriff for evaluation, and to determine his/her fitness-for-duty.

VII. WEAPONS AND AMMUNITION PROCEDURES

Authorized Weapons – On and Off Duty

- On Duty
 - Service pistols and magazines shall be loaded to capacity with Sheriff's Office issued ammunition. Shotguns shall be loaded to magazine capacity with Sheriff's Office issued ammunition, with the firing chamber empty. Rifles shall be unloaded; with issued magazines loaded with Sheriff's Office issued ammunition in accordance with the deputy's training, and authorized weapons shall be readily available. Authorized weapons are only those, which have been issued by the Sheriff's Office. Deputies shall carry only Sheriff's Office-issued approved weapons and ammunition as their primary on-duty weapon.
 - Deputies while on/off duty, and operating an official patrol vehicle, while not wearing an approved Sheriff's Office uniform, shall have on their person his/her issued service pistol and official Sheriff's Office identification credentials. While wearing civilian clothing, the deputy shall not make a public display of his/her firearm or remove it from its holster except for lawful purposes. The only exception to this policy is when a deputy is attending a closed meeting, (i.e. Law Enforcement Only) the deputy may secure his/her service pistol in the trunk of his/her Patrol Vehicle while actively involved in the meeting.
 - A deputy's personally-owned firearm approved by the Sheriff for back-up or off duty use in compliance with this directive, may be carried as a back-up firearm. Deputies are not required to carry a back-up firearm while on duty, but may do so at their discretion after qualifying with said weapon in

accordance with NC Criminal Justice Training and Standards requirements by a certified firearms instructor.

- When carried, shotguns and rifles shall be kept secured in the patrol vehicle except when removed in the line of duty. Deputies shall remain constantly aware of the type of ammunition loaded into their firearms. Shotguns and rifles shall be periodically checked for the type and variety of ammunition with which they are loaded. Deputies shall promptly replace any ammunition suspected to be faulty via their immediate supervisor.
 - Issued rifles shall be used when the deputy determines that a weapon capable of firing a single projectile at close range, extended range, or confined areas is necessary.
 - Deputies may purchase a spare magazine, meeting Sheriff's Office specifications, for the issued pistol.
 - The additional magazine may be carried in the Patrol vehicle for on-duty use, with prior approval of the affected deputy's immediate supervisor. Additional magazines shall be manufactured by a reputable firearms manufacturer.
 - The use of lead or cast bullets in firearms practice causes a build-up of lead in the feed ramp and barrel, which could result in a malfunction or a failure to feed properly. Therefore, deputies shall fire only jacketed ammunition in the issued and personally owned, back-up, or off-duty semiautomatic pistol.
- Off-Duty and Back-Up Firearms
 - In strict conformance with federal and state law and this policy, deputies are authorized to possess and carry a concealed firearm (either their issued service firearm or an authorized personal firearm) while off duty. Use of off-duty weapons shall be reported immediately to a supervisor. The same reporting procedures will apply as an on-duty incident.
 - Prior to carrying a personally-owned firearm off-duty or as a back-up weapon, the deputy shall have the weapon inspected by the Sheriff's Office Firearms Instructor. The Firearms Instructor may approve or reject the use, or the type and caliber of the firearm requested in accordance with Sheriff's Office policy. If the firearm is approved for off-duty or back-up use, the Firearms Instructor shall certify the qualification by the deputy with the personally-owned weapon, and forward the Firearms Qualification Record (F-9A) to the Sheriff's Office Armory Officer or designee to be placed in the deputy's personal firearms file.
 - A deputy who elects to carry his/her Sheriff's Office-issued or personally owned firearm(s) while off duty will be required to have in his/her

possession the official badge and identification holder identifying him/her as a sworn deputy of the Vance County Sheriff's Office.

- Each personally owned firearm and ammunition approved for back-up or off duty use must be documented on a Firearms Qualification Record (F-9A) and maintained by the Armament Officer or designee, who shall place the Record in the deputy's personal firearms file. If at any time or for any reason a deputy elects to discontinue the use of a personally-owned firearm for back-up or off duty use, the deputy shall notify the Armament Officer immediately, via memorandum through the chain of command, indicating the effective date and reason for discontinued use.
- A deputy must qualify with the approved personally owned firearm that is intended to be used as an off-duty or back-up weapon on an annual basis. The course of fire for qualifying will be the same (or similar in nature as the type of firearm will allow), as currently required for the Sheriff's Office-issued firearm. A failure to qualify shall automatically suspend the authorization to carry the personally owned firearm. The deputy may not carry the firearm until satisfactory qualification and approval of the Firearms Instructor.
- Only those firearms and ammunition of the type and caliber approved by the designated Firearms Instructor will be carried as back-up or off-duty.
 - Firearms carried as back-up or off-duty shall be no smaller than a .32 or .380 caliber and no larger than a .45 caliber. These weapons shall be of a good quality, produced by a recognized manufacturer, and appear to be in good working order, and the mechanisms shall not be modified except as provided in the manufacturer's owner's manual.
 - Ammunition used for qualifying or while carrying personally owned, back-up, or off-duty firearms shall be provided by the individual deputy and must be from a commercial manufacturer, approved by the Firearms Instructor. Deputies must qualify with the ammunition they intend to carry in the firearm, which shall be documented on the Firearms Qualification Record (F-9A). **Ammunition must be service grade (not reloaded or remanufactured).**
 - The size of the Sheriff's Office-issued pistol may prevent proper concealment; therefore, discretion must be used in carrying this weapon off duty.
 - Deputies who practice while off duty with issued weapons shall comply with all policies regulating the use of firearms.
- A deputy shall not consume or have remaining in his/her body any alcohol previously consumed or be under the influence of alcoholic beverages or any impairing substance while handling a firearm or while possessing any firearm away from his/her own premises.

- Deputies shall not make a public display of a firearm or remove it from its holster while off duty except for lawful purposes.
- A deputy who has been relieved of duty pending an investigation, on disciplinary suspension, or is required to surrender his/her issued firearms for any reason, or is otherwise prohibited from exercising powers of arrest, is not authorized to carry a concealed, personally owned firearm while off duty during the period the deputy is relieved of duty, or on disciplinary suspension.

Firearms Procedures

- A deputy shall never fire warning shots.
- A deputy shall not remove side arms from holsters except for authorized use in accordance with this policy, for inspection by a superior officer, or for other authorized purposes.
- A deputy shall not permit any person, other than another deputy, to use Sheriff's Office firearms.
- The killing of an animal is justified:
 - For self-defense
 - To prevent harm to the deputy or another person
 - When the animal is so badly injured as to require that it not continue to suffer. In the case of livestock, a reasonable effort must be made to contact and notify the owner. If the owner cannot be contacted within a reasonable period, the deputy may take the necessary action. Incidents involving game and non-game animals under the jurisdiction of the Wildlife Resources Commission will be reported to that agency using the notification method established by the Sheriff's Office Captain or designee. Incidents involving domestic animals and livestock will be reported to the nearest animal control agency. Neither a Report of Investigation nor a Use of Force/Assault Report needs to be completed when an animal is shot; however, a memorandum outlining the deputy's actions shall be sent to the affected deputy's immediate supervisor within twenty-four (24) hours of the incident, and he/she shall request any used ammunition be replaced as soon as possible.

Shooting at Moving Vehicles

- Discharging a firearm at a moving vehicle involves a possible risk of death or serious injury. There may be a risk of harm to occupants of the suspect vehicle who may not be involved, or involved to a lesser extent, with the actions of the suspect creating the threat.

- Deputies shall not fire at unarmed violators in a moving vehicle unless the deputy reasonably believes that the oncoming vehicle presents an imminent threat of death or serious physical harm to him/her or third person, and no other means are available at that time to avoid or eliminate the danger.
- No deputy shall intentionally position him/herself into the path of a vehicle that is attempting to flee. Whenever possible, the effected deputy shall make a reasonable effort to get out of harm's way if a vehicle is moving toward him/her.

Investigation and Reporting of Firearms Incidents

- A deputy shall immediately report to his/her supervisor every use of a firearm in the performance of his/her duty, either intentional or accidental not related to training. Any time a deputy removes his/her pistol from its holster during an enforcement contact, such action shall be deemed either *display of firearm* or *use of firearm*. For *display of firearm* cases, the deputy shall complete **only** a Use of Force Report, with a narrative that is brief, factual, and to the point. For *use of firearm* cases, the supervisor, in conference with the Division Commander or higher authority, shall carefully examine all the facts and circumstances surrounding the incident, and determine compliance with Sheriff's Office rules, policies, and procedures.
- A deputy involved in a shooting incident, which results in death, or serious personal injury to anyone shall immediately be relieved from normal duty and assigned to administrative duties by his/her Division Commander. The affected Division Commander shall follow the provisions set forth in Section VI (Administrative Leave and Review) of this Policy. The deputy shall be ordered to take a drug test to eliminate the possibility that drug use may have affected the deputy's actions or judgment. The appropriate Division Commander or his/her designee shall immediately begin to collect pertinent information necessary for a preliminary investigation and shall contact the Sheriff's Office Captain, who shall assume direction of the preliminary investigation at the earliest possible time.
- After debriefing of the deputy in accordance with Sheriff's Office policy, if it reasonably appears that the shooting was justified, the deputy may be re-assigned to normal duty by the Sheriff.

Maintenance and Care of Firearms

- All deputies shall keep their Sheriff's Office issued and back-up or off-duty firearms in excellent condition.
- Deputies shall not in any manner alter or tamper with the internal working mechanisms of their Sheriff's Office-issued firearms.

IV. ABUSE OF POSITION

Deputies are prohibited from using their official positions or their official identification cards and badges for:

- Intimidating or harassing of anyone for personal reasons
- Obtaining privileges not otherwise available to them or to someone else
- Avoiding the consequences of illegal acts

Deputies are prohibited from lending their identification cards or badges or any replica thereof to another person or permitting these items to be photographed or reproduced.

V. OBEDIENCE TO ORDERS

Orders of Superior Officers

- Employees shall obey all lawful orders and directions given by superiors and shall obey the instructions given by Vance Central personnel pertaining to assignments and/or emergencies. Such obedience shall be prompt, willing and respectful.

Insubordination

- The failure or deliberate refusal of any personnel to obey any lawful order given by any superior shall be deemed insubordination. Failure to recognize the authority of any superior, show disrespect, or disputing his orders shall likewise be deemed insubordination. Insubordination may also be recognized by any act or word delivered or presented in a disrespectful, mutinous, insolent, curt, patronizing or abusive manner. This shall include personnel of like rank or reversed rank where one has been appointed an acting supervisor over another.

Manner of Issuing Orders

- Personnel acting in a supervisory capacity shall communicate in clear, understandable language, civil in tone, showing respect toward their subordinates, and fellow employees. Orders, directions or other communications shall not be delivered by word or deed showing disrespect, rude, patronizing, abusive or insulting manners

Unlawful Orders Prohibited

- No supervisor or employee shall knowingly and willfully issue any order violating any law or ordinance or agency rule. If in doubt as to the legality of an order, the employee shall in a respectful, discreet manner, request the issuing person to clarify the order or to confer with higher authority.

- Obedience to Unjust Orders
 - Employees who receive orders they feel are unjust or contrary to the Policies or Rules of the Sheriff's Office or the spirit of the Policies or Rules of the Sheriff's Office must first obey such orders to the best of their abilities and may then proceed with appeals or notification to the Sheriff via proper channels.
 - Unjust orders may respectfully be questioned if the safety or well-being of an individual or property is at stake.
- Procedure from Unjust Orders
 - Employees may appeal for relief from orders or instructions which are unjust. Such appeals must be made in writing to the Sheriff via the chain of command as described in the Grievance Procedures policy. Irresponsible or capricious appeals will be considered serious misconduct.
- Reporting Unlawful Orders
 - Any employee receiving unlawful, unjust or improper orders shall at the first opportunity report in writing the facts of the incident, to include his/her own actions to the Sheriff via the chain of command.

Conflicting Orders

- Should any order conflict with any previous order or instruction issued by another superior or with any policy, the employee to whom the order is given shall respectfully call attention to the conflict.
- If the conflict is over the radio, a telephone call shall be attempted to notify the supervisor of the conflict. If a telephone call is not possible, then the employee shall respectfully, discretely and as tactfully as possible explain the conflict. Under no circumstances shall personnel engage in an argument, or any disrespectful or inappropriate communication over the radio.
- If the superior giving the second order does not eliminate the conflict, his/her orders stand and the responsibility of the conflicting order shall be his/hers. If he/she so directs, the last command will be obeyed first.
- Orders will be countermanded or conflicting orders issued only when reasonably necessary for the good of the Sheriff's Office, or the safety of persons or property.

VI. EMPLOYEE'S CONDUCT

Unbecoming Conduct

- Employees shall conduct themselves at all times, both on and off duty, in such a manner as to reflect most favorably upon the Sheriff's Office and in keeping with the high standards of professional law enforcement. Unbecoming conduct shall include any conduct that constitutes unacceptable personal conduct pursuant to County Government Policy, and any conduct which tends to bring the Sheriff's Office into disrepute, or which reflects discredit upon any employee(s) of the Sheriff's Office, or which tends to impair the operation and efficiency of the Sheriff's Office or of an employee, or which violates Sheriff's Office policy.

Truthfulness

- Personnel are required to speak the truth at all times, whether under oath or not, in giving testimony or in connection with any legal official order received or in connection with official duties. In matters of an internal nature, members are required to speak the truth and cannot elect to stand silent if they have information on a matter under inquiry.
- If an employee stands silent, refuses to speak or speaks untruthfully, the employee may be terminated.
- Employees shall not file false complaints or make false charges against other employees or persons, including making false charges against pretrial detainees.

Impartial Conduct

- Personnel while carrying out their respective duties must strictly maintain impartial conduct in word and deed toward complaints, violators, citizens, subordinates and inmates.
- Sworn personnel and detention services personnel shall at all times consider it their duty to be of service to anyone in danger or distress. When certified or qualified to render first aid or other help, personnel may themselves render the aid, and if not qualified then must assist in attempting to find the appropriate help.

Proper Identification

- Employees shall politely give their name and other pertinent identifying information to any violator(s), citizen(s) or inmate(s) when requested to do so, unless such action is likely to jeopardize the successful completion of an assignment.

- Sworn uniformed personnel must properly identify themselves at all times by wearing a name plate properly displayed on their uniform. Uniformed detention officers must properly wear their correct identification credentials displayed on their uniforms.
- Non-uniformed sworn personnel must have their identification available or displayed according to their duty assignment. Plain clothes detention personnel must properly wear their correct identification credentials.
- Civilian employees including detention personnel are prohibited from representing themselves as law enforcement, whether on-duty or off-duty in any capacity. Representation may be construed as outright action or a nuance such as displaying a detention services badge on a belt while in plain clothes. When addressed by another to be a sworn law enforcement officer, the civilian should politely correct the person who addressed him.

Duty to be Courteous and Patient

- Personnel shall at all times be courteous, patient and respectful in dealing with the public as well as fellow employees. All business conversations shall be conducted in a courteous and even-tempered, professional manner. Personnel shall refrain from using foul or insulting language.

Respect for Fellow Employees

- Employees shall treat fellow employees of the Sheriff's Office with the respect due to them as fellow employees. All personnel shall be courteous, civil, and respectful of their superiors and fellow employees whether on or off-duty.
- When employees are addressing or referring to a ranking officer, the proper rank and name shall be used.

Supporting Fellow Employees

- Employees shall cooperate, support, and assist each other in all ethical endeavors at every opportunity and shall not publicly criticize another employee.

Threatening or Insulting Language

- Personnel shall not use threatening or insulting manners in word or deed nor behave in an insubordinate manner toward any superior officer or fellow employee.
- Under no circumstances will an employee make jokes, detrimental references or actions, snide comments or other inappropriate words or actions in reference to a fellow employee, citizen or other person concerning but not limited to race, sex, sexual preference, religion, national origin, creed, or appearance.

Criticism or Circulating Scandalous Stories

- Personnel shall not publicly criticize the actions of any judicial official, District Attorney or any Assistant District Attorney, or other officer of any court by word or deed. Personnel shall refrain from circulating scandalous stories or criticism about employees of the Sheriff's Office or any other governmental employee.

Relationship with the Press

- Employees shall refer all media inquiries to the Sheriff's Office Captain or other appropriate personnel as assigned duties as press officer. Unless authorized by the Sheriff or his/her designee, personnel are prohibited from interaction with the media.
- Incident reports released by the records clerk, is an appropriate action of that position designated by job description.

Reading on Duty

- While on duty in an official Sheriff's Office vehicle, inmate housing area, or when receiving the public in an office setting, personnel shall not read newspapers, periodicals, or similar material except in the line of duty.
- Pornographic material is never allowed in any Sheriff's Office assigned property, unless it has been seized as evidence, and then it must be properly processed as such. Pornographic matter is never allowed in the detention facility.
- It is in the Sheriff's discretion to define pornographic material.

Sleeping On-Duty

- Personnel shall never sleep or give the appearance of sleeping on duty. Uniformed personnel shall not sleep or give the appearance of sleeping anytime while in uniform.

Medication

- Employees taking medication which causes drowsiness or which suppresses or affects normal activity must notify their immediate supervisor prior to reporting for duty, so their supervisor may make a determination as to whether the employee should report for duty or not.

Alcoholic Beverages / Drugs

- Personnel shall not ingest any alcoholic beverages, be intoxicated, or have the odor of alcohol about them while in uniform or on duty. Personnel shall

not consume any amount of alcohol to the extent it renders them unfit for duty.

- Personnel shall not be under the influence of any drug which appreciably impairs their ability to perform assigned duties, whether prescribed or not.
- No employee shall take any alcoholic beverage or illegal substance into any County or Sheriff's Office facility, except in the performance of their official duties. Confiscated alcoholic beverages and illegal substances shall be turned over to the appropriate property supervisor, and stored as directed by the "Evidence / Property Collection, Analysis, and Disposal" policy.

(Note: Employees charged with driving while impaired may be terminated through the administrative process. Such termination can take place prior to any court proceedings, and/or regardless of the outcome of the court case.)

Telephone

- No home or contact numbers are to be given out to anyone outside the agency. The person receiving the request for a contact number may either record the caller's name and number for the employee, or contact the employee in question them self and relay the message. Personnel rosters with home addresses and phone numbers on them are considered confidential.
- Telephone courtesy is a basic but important means of enhancing the professional image of the Sheriff's Office. Office phones are to be answered promptly, courteously, and in a business-like manner.
- Personnel answering Sheriff's Office phones shall speak slowly and clearly.
- Sheriff's Office phones shall be answered with an appropriate greeting for the time of day; give the name of the agency or division and the employee's rank or title, and their name.
 - Example: "Good afternoon, Vance County Sheriff's Office, Sgt. Doe..."
 - Example: "Good evening, Vance County Detention Facility, Officer Doe..."
- If it is necessary to put the caller on hold, politely tell the caller you are placing them on hold and you will be back promptly. If you cannot do what the caller is requesting, such as finding another person, politely tell the caller, and take a message and then deliver the message to the appropriate person.
- Employees shall end calls by an appropriate ending such as "thank you" or "good bye".
- Personnel shall never just hang-up on a caller.

- Persons calling the Sheriff's Office shall be addressed by their correct title such as "Judge, Mr., Ms., Officer, etc".
- Long distance calls should be kept to a minimum. No personal long distance calls shall be charged to any County Owned telephone.

VII. APPEARANCES

Personal Appearance

- Personnel shall be neat and clean in appearance whether working in plain clothes or uniform.
- Plain clothes sworn/civilian personnel shall wear appropriate attire for their assigned duties.

Care of Sheriff's Office, Property, and Vehicle

- Employees are responsible for the proper care of all equipment issued to them. Personnel shall take reasonable precautions for all agency or county property to prevent damage, loss, or destruction.
- If the event of damage, loss, or destructed property, whether intentional or unintentional, a written explanation of the circumstances shall be made to the employee's immediate supervisor, who shall forward the written explanation to the Sheriff's Office Captain. If the loss was willful or caused by negligence on the part of the employee, the employee may be held responsible for the cost of replacing the property in question.
- Personnel shall maintain offices, desks, vehicles, lockers or other work areas or stations, assigned or not, in a clean, neat, and orderly condition.
- Personnel shall clean and pick up after themselves.

VIII. ATTENTION TO DUTY

Employees Always Subject to Duty

- Although certain hours are allotted for the performance of assigned duties, all personnel are subject to report for duty at any time.
- Sworn personnel shall not ordinarily act in a law enforcement capacity when not on duty except in cases of public safety or on direct orders from a superior officer.
- Sworn personnel shall have a working telephone at their residence. They shall have the correct phone number and their correct residence listed in their personnel file in the Sheriff's Administrative Assistant's Office.

- All civilian employees shall have a phone number through which they can be reached. If they have a phone, the correct number shall be listed in their personnel file the Sheriff's Administrative Assistant's Office, along with their current address. If the civilian employee does not have a telephone of any type, a telephone number through which they may be easily contacted. The telephone number shall be listed in their personnel file.
- Deputies and Detention Officers are required to reside within reasonable distance of the Sheriff's Office headquarters building which meets the approval of the Sheriff.

Reporting for Duty

- Employees, unless otherwise directed, shall report for duty or present themselves at the time and place specified. They shall be properly dressed and equipped, and mentally ready to perform their assigned duties.
- An employee who feels he/she can not report for duty, must contact his/her supervisor as soon as possible upon determining he/she will be unable to report for duty, or at least one (1) hour before the time he/she was to begin duty.
- If the immediate supervisor is not available and every effort has been exhausted to contact him/her, the employee must report to another on-duty supervisor, in the same chain of command if at all possible. Word left with clerks, Vance Central personnel, or personnel outside their own chain of command or other inappropriate personnel is unacceptable.
- Employees not reporting for duty as scheduled, and who do not report out as per procedure will be determined to be absent without leave. Personnel found to be absent without leave, must provide adequate proof to be excused from the violation. Those not providing adequate proof will be subject to discipline which may include termination.

Prompt Response to Duty / Calls

- Personnel shall respond to duty assignments without delay, or as directed.
- Personnel shall respond without delay to radio calls for service and calls for assistance. Calls should be answered consistent with normal safety precautions and Motor Vehicle Laws.

Attendance in Court

- Any employee subpoenaed to testify in any trial involving Federal/State Courts, or in any hearing or trial shall notify the Sheriff immediately via the chain of command.

- Whenever an employee is ordered to appear in court on any matter in which his/her presence is required, he/she shall punctual and testify truthfully.

IX. UNSATISFACTORY JOB PERFORMANCE

Deputies shall maintain sufficient competency to properly perform their duties and to assume the responsibilities of their positions. Deputies shall perform their duties in a manner, which will tend to establish and maintain the highest standards of efficiency in carrying out the functions and objectives of the Sheriff's Office.

Examples of unsatisfactory performance include but are not limited to the following:

- Failure to properly supervise subordinates
- Lack of knowledge of the proper application of laws the deputy is required to enforce
- Unwillingness or inability to perform assigned tasks
- Failure to conform to work standards established for the deputy's rank, grade, or position
- Failure to take appropriate enforcement action at any time
- Absence without leave
- Unnecessary absence from assigned duty
- The following will be considered prima-facie evidence of unsatisfactory performance:
- Repeated poor job performance evaluations
- Repeated infractions of policy, regulations, manuals, or directives.

X. SHERIFF'S OFFICE REPORTS

Deputies shall submit all necessary reports on time and in accordance with established Sheriff's Office procedures.

XI. RESTRICTIONS ON ACTIVITIES

Memberships in Unions Prohibited

- Personnel shall not join a labor union nor shall they join any organization:

- that maintains the right of its members to strike;
- that discriminates based on race, sex, creed, religion or national origin;
- that attempts to interfere with the operation of the Sheriff's Office; or
- which might in any way exact prior consideration and thus interfere with the efficient, safe and effective operation of the Sheriff's Office or the citizens of Vance County.

Seeking Personal Preferment

- Employees are forbidden to solicit petitions, influence, or intervene on behalf of any person inside or outside the Sheriff's Office for purposes of personal preferment, transfer, advantage, advancement, promotion, or change of duty assignment for themselves or for any other employee.

Soliciting, Accepting Gifts, Gratuities

- Employees shall not accept any gift, gratuity, present, or fee designed to influence or obligate the employee to neglect their duty, violate their oath of office or violate any law, ordinance, policy, rule or regulation of the Sheriff's Office

Rewards

- Other than their lawful salary, personnel shall not accept any gift, gratuity, or reward in money or other compensation for services rendered in the line of duty.

Gifts from Employees

- Employees shall not receive or accept any gift or gratuity from another employee, or perform or accept the performance of any deed or action if there is any indication that preferential consideration or obligation is the purpose, or may be the result of such gift or gratuity.

Soliciting Special Privileges

- Personnel shall not use their official positions to solicit special privileges for themselves or others, such as free admission to places of amusement, discounts on purchases, or other favors. "Badge Flashing" is strictly prohibited for this purpose.

Giving Testimonial, Seeking Publicity

- Personnel shall not give testimonials or permit their names or photographs to be used for advertising purposes in affiliation with the Sheriff's Office.

Personnel shall not seek personal publicity, either directly or indirectly in their employment except by expressed permission of the Sheriff.

Acting as Bailer, Accepting Bail

- Pursuant to N.C.G.S. § 15A-541, any peace officer or spouse of a peace officer who becomes a surety on a bail bond for any person other than a member of his or her immediate family is guilty of a class 2 misdemeanor. Accordingly, deputies shall be prohibited from acting as bailers, sureties, or otherwise agreeing to be responsible for any confined person other than for members of their immediate families.
- Personnel shall not receive or accept money to be turned in as a fine or bail for persons charged or cited for infractions, criminal violations or convictions.

Fictitious Illness or Injury

- Deputies shall not fake illness or injury, falsely report themselves ill or injured or otherwise deceive or attempt to deceive any official of the Sheriff's Office as to the condition of their health

Recommending Attorneys or Bondsmen

- Personnel shall not suggest, recommend, advise or counsel the retention of any particular attorney or bondsman to any person directly or indirectly interested in the disposition of any criminal or civil court matter involving the Sheriff's Office.

Civil Action

- Personnel shall not use their positions with the Sheriff's Office in an attempt to intimidate anyone with whom they are involved in civil controversy to force settlement in the employee's favor.
- An employee shall not use his position with the Sheriff's Office in an attempt to intimidate anyone involved in a civil or criminal controversy, or to force settlement or decision in any particular favor.

Notice of Suits against Employees

- Any employee having a civil suit filed against him by reason of an act performed by him/her in the line of duty, shall immediately notify the Sheriff in writing, and furnish a copy of the civil complaint, along with a full and accurate account of the circumstances in question attached to a copy of the incident report, if applicable.

Payment of Debts

- Employees shall not undertake any financial obligations which they know or should know they will be unable to meet and shall pay all just debts promptly. An isolated instance of financial irresponsibility will not be grounds for discipline except in unusually severe cases. However, repeated instances of financial irresponsibility shall be cause for disciplinary action.

Financial difficulty stemming from unforeseen medical expenses or personal disaster shall not be cause for discipline, provided that the deputy is making a reasonable, good faith effort to settle all accounts.

Employees shall not become financially obligated to subordinates or supervisors.

Personal Mail

- Personnel shall not use the agency's address or name for personal mail or billing actions. All personal mail and bills shall sent to the employee's through current home or other personal mailing address, i.e. Post Office Box.

Public Appearances and Statements

- Employees shall not publicly criticize or ridicule the Sheriff's Office, its policies, or other employees by speech, writing, or other expression when such criticism or ridicule directly or visibly affects or would reasonably be expected to directly or visibly affect the operation of the Sheriff's Office.
- Without the official approval of the Sheriff, employees shall not address gatherings, appear on radio or television, prepare any article for publication, act as correspondents to a newspaper or periodical, or release or divulge investigative information or any other matters pertaining to the Sheriff's Office while holding them self out as having an official capacity in such matters. Official approval may be given to conduct safety programs and otherwise release information concerning safety matters so long as this activity does not conflict with the official position of the Sheriff's Office.

Gambling

- Employees shall not engage in any form of gambling which is in violation of Federal, State, or local laws.

Entering Establishments Selling Liquor

- Sworn employees while on duty, whether in uniform or civilian attire, shall not be in any establishment which is not properly licensed by the State of North Carolina permitting the sales and/or consumption of alcoholic beverages, unless required by performance of duty.

- Sworn employees, while on duty, whether in uniform or civilian attire, are permitted to enter establishment which are properly licensed by the State of North Carolina during their meal break. However, he/she shall not enter this establishment and purchase and/or consume any alcoholic beverage.
- Personnel are prohibited from purchasing and/or transporting any alcoholic beverages in County owned vehicle except for evidence/property purposes.
- Except for duty purposes, while on duty, personnel are restricted from entering any establishment which has the primary purpose of selling alcoholic beverages.

XII. UNAUTHORIZED DISCLOSURE OF INFORMATION

Personnel shall not disclose any confidential Sheriff's Office plans, policies, orders, proceedings, personnel problems, or other information except as authorized by the Sheriff. Detectives, to include vice and internal matters, shall not disclose any classified information except on a "need to know" basis.

This provision is not to be construed to prevent the release of information concerning law enforcement activities which are not confidential.

XIII. CONFIDENTIALITY OF INFORMATION

No employee shall discuss the following outside the Sheriff's Office unless the discussion is justified and work related:

- juvenile court proceedings;
- juvenile arrest records;
- investigative or interview information;
- personnel matters;
- internal affairs and disciplinary proceedings;
- internal operations of special projects;
- organized crime operations;
- any open investigation; and
- other inappropriate matter.

Procedure

- If an employee receives a request for information and is uncertain about classification status of the information, the employee must consult with his/her immediate supervisor before giving out the information. Employees uncertain about information must not release information.

Vice / Narcotics Information

- Organized Crime Information
 - Any employee of the Sheriff's Office who receives information either by phone or in person concerning any vice or narcotics activities will note all pertinent information, to include a call-back telephone number, and immediately pass the information to the supervisor in charge of vice or narcotics. If the vice or narcotics supervisor is not available, the information will be given to a vice or narcotics unit member.
 - If no one from the vice or narcotics unit is available, an on-duty shift Lieutenant may be contacted.
 - Any information received after normal business hours, will be given to the senior duty supervisor. The supervisor shall determine if the on-call vice or narcotics unit member will be contacted, or if a message should be left for follow-up by the appropriate unit.
- Identification of Vice or Narcotics Investigators
 - Under no circumstances will any employee confirm or identify by name or description any member of the Vice or Narcotics Unit to anyone.
 - Any persons seeking such information shall be immediately referred to the Sheriff or the Sheriff's Office Captain.

XIV. SUSPECTS, ARREST, PRISONERS

Accepting Gifts from Suspects, Prisoners

- Employees are strictly prohibited from soliciting or accepting any gift, gratuity, loan, fee, or any other item, or item of value, or from lending or borrowing or from buying or selling anything of value from, or to any suspect, prisoner, defendant, other person involved in any case, professional bondsmen, or other persons who may profit from information or influence obtained from the employee of the Sheriff's Office.
- This shall not pertain to law enforcement personnel while conducting a special operation or undercover investigation. Strict accounting and reporting is required under these circumstances. Enforcement personnel conducting such operations or investigations may not keep any gift, gratuity, loan, fee, or

any other item or item of value obtained pursuant to the operation or investigation.

Reduction of Charges

- Personnel shall not influence the reduction of any charge or the disposition of any charge initiated by them or any other law enforcement official, either directly or indirectly.

XV. POLITICAL ACTIVITY

This agency shall not be in conflict with Vance County's policy for Political Activity located in the Vance County Policy Manual.

- Vance County employees have the right to express their views as citizens, to pursue their legitimate involvement in the political system and to vote. However, no employee shall engage in or be subject to coercion for political purpose.
- Employees shall not conduct themselves in any unprofessional manner nor in any manner that would bring reproach on the Sheriff, the Sheriff's Office, or any of its employees.

Additionally, on duty sworn employees shall stay away from election polling locations except when voting or when dispatched for a call. Sworn employees, while on-duty, shall not take any action at any polling location to influence or which could be construed as influencing voting.

On-duty employees shall not engage in political activities; campaigning; distributing political information or paraphernalia; putting up signs; or actively endorsing or not endorsing any candidate.

Employees of the Vance County Sheriff's Office shall not engage in any activity while on/off-duty which involves the destruction of any candidate's political advertisements or endorsements. Employees who violate this provision of policy shall be subject to disciplinary action up to termination.

Employees of this agency registered to vote shall be given reasonable time to vote in bona fide elections.

Employees going to the polls during duty hours shall go to the poll, vote, and depart immediately after voting. Employees may request of their immediate supervisors time-off to vote, and such request shall be made either in person or by phone. Requests are not to be made by use of the communications radio or through another person.

Any employee working at a polling place during an election shall be either off duty or on vacation. An appropriate leave slip shall be on file prior to the leave being taken.

Any employee, who receives a complaint regarding unlawful or disruptive activity at any voting location, shall immediately notify the Sheriff's Office Captain, who shall take the appropriate action to resolve the complaint.

XVI. AUDIO / VIDEO MONITORING

Vance County Sheriff's Office employees, shall not record, or monitor, either by audio and/or visual devices, anyone, without all parties first being informed of the monitoring or recording.

Exceptions to this policy are:

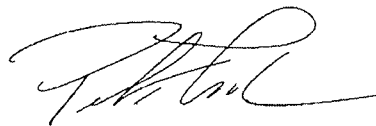
- normal telecommunications functions; and
- investigations of criminal matters.
- WHEN OFFICER SAFETY IS AN ISSUE

XVII. INMATE RELATIONSHIPS PROHIBITED

No employee of the Sheriff's Office shall date, attempt to date, flirt, or make advances toward, or promote a relationship with any inmate.

If an employee has a personal relationship established with someone who is detained in Vance County Detention Facility, the employee shall not be placed in a position to supervise the inmate; nor shall the employee attempt to date, flirt, or make advances toward the inmate that may or appear to be of a personal nature while the inmate is in custody. It is the responsibility of the employee to inform his/her supervisor of a close personal relationship or kinship exists with an inmate in the custody of the Detention Facility.

Employees shall not use official records or other documents of the Sheriff's Office to contact any inmate for the purpose of promoting a personal relationship of any type.



Peter White
Sheriff
Vance County

W Bullock – E.2 Investigate Complaints

I. POLICY

This policy provides guidelines for accepting, recording, resolving, and forwarding complaints.

II. ACCEPTING, RECORDING, RESOLVING, AND FORWARDING COMPLAINTS

Accepting Complaints

- A complaint or charge against Sheriff's Office employees may originate from within the Sheriff's Office or from the general public. Charges from within the Sheriff's Office shall be processed as provided in this policy. Complaints from the general public shall be courteously accepted by any employee of the Sheriff's Office and shall be processed as hereinafter provided in this subchapter. No employee shall attempt to discourage any person from lodging a complaint. A supervisor has the obligation to investigate possible violations of policy even if the person providing the information does not want a complaint filed.

Resolving Complaints Based on Misunderstanding of Sheriff's Office Policy

- In the case of complaints involving a misunderstanding of laws, ordinances or policy on the part of the complainant, the employee receiving the complaint shall attempt to resolve the complaint by explaining the law, ordinance or policy to the complainant. If the employee is unable to resolve the complaint, he/she shall refer the complaint to his/her supervisor, who shall attempt to resolve it. If the supervisor is unable to resolve it, the supervisor shall refer the complaint on up the chain-of-command.

Recording Complaints Alleging Violation of Code of Conduct

- If the complaint involves a possible violation of the Rules of Personal Conduct, or Unsatisfactory Job Performance by any employee of the Sheriff's Office, the employee receiving the complaint shall accept the complaint, record the information and forward the information to his/her appropriate supervisor, who shall be responsible for completing a Personnel Complaint if warranted, after consultation with the appropriate the ranking supervisor of the division or higher authority. Such a complaint shall be accepted and recorded even when the identity of the complainant and/or the employee is unknown.

- If the complainant indicates no desire to make a formal complaint but has indicated a violation of Sheriff's Office policy by an employee, this information must be transmitted to a supervisor. The supervisor must document the information and determine if such information warrants further inquiry to determine if a complaint should be filed by the supervisor. If the supervisor determines a violation of policy may have occurred, the supervisor shall complete the Personnel Complaint, after consultation with the ranking supervisor of the division or higher authority.

Forwarding Complaints Alleging Violation of Code of Conduct

- After completing a Personnel Complaint, the supervisor shall immediately forward the original copy of the Personnel Complaint of the affected employee and any other appropriate documents to the Sheriff's Office Captain, the Sheriff's Office Captain shall acknowledge the receipt of all complaints to the complainant. Upon conclusion of the investigation, the complainant shall be notified that the investigation has been completed.
- If it appears that an internal investigation will exceed thirty (30) calendar days and after each extension granted by the Sheriff, a letter indicating the status shall be mailed to the complainant by the Sheriff's Office Captain.

Classifying and Assigning Complaint Investigations

- The Sheriff's Office Captain shall classify the alleged complaint as a Personal Conduct, or Unsatisfactory Job Performance violation and direct or conduct an investigation. When an investigation is assigned to supervisors other than the Sheriff's Office Captain, the Division Commander shall designate the supervisory personnel to conduct the investigation.

III. INVESTIGATION OF COMPLAINTS AT THE DIVISION OR EQUIVALENT STAFF LEVEL

Designation of Investigator

- The supervisor responsible for imposing disciplinary action against an employee accused of a Personal Conduct, or Unsatisfactory Job Performance violation may designate a subordinate within the supervisor's command to investigate the complaint. In complex investigations, any supervisor may request that the Division Commander or higher authority take charge of, any specific investigation.

Conduct of the Investigation

- Before permitting the investigation to begin, the supervisor of the employee being investigated shall notify the employee of the investigation, except in cases where such notification would jeopardize the investigation. Should the employee admit the conduct alleged and that such conduct is, in fact, a violation of policy, then the supervisor, after consulting with Division

Commander or higher authority, may impose the appropriate disciplinary action without further investigation! In the event the employee denies the violation with which he/she is charged, the investigation shall proceed as provided.

- The employee shall be given an opportunity to supply the investigator with evidence or witnesses favorable to the employee. No decision as to whether or not the employee violated the rules of Personal Conduct, or Unsatisfactory Job Performance shall be made against a charged employee until the employee has had a reasonable opportunity to produce evidence or witnesses, and has had an opportunity to explain the his/her actions.
- The supervisor chosen to investigate the complaint shall not go outside the jurisdiction of Vance County or neglect regular duties in order to carry out such investigation without the authority of their immediate supervisor or higher authority. No investigative action shall be taken in any case where it might jeopardize a simultaneous or subsequent investigation.
- The investigator shall make every effort to complete the investigation within thirty (30) calendar days. If the investigator will be unable to do so, he/she shall inform the supervisor requesting, and/or the Sheriff's Office Captain as to the reasons why the investigation cannot be completed within thirty (30) calendar days, and shall estimate the additional time needed to complete the investigation.
- If, upon completion of the investigation the supervisor authorized to impose disciplinary action determines that the employee should be exonerated or that the results of the investigation are inconclusive, the supervisor shall, after conferring with the Division Commander or higher authority, inform the employee and forward the Report of Investigation and all related documents to the Sheriff's Office for filing in the employee's personnel file.
- If, upon completion of the investigation and after allowing the charged employee an opportunity to explain his/her actions, the supervisor determines that the employee should be disciplined, the supervisor shall confer with the appropriate Division Commander or higher authority, and shall administer disciplinary action within the options authorized by the Sheriff.

IV. INVESTIGATION OF COMPLAINTS AT THE SHERIFF'S OFFICE LEVEL

The Sheriff Office Captain shall be responsible for the supervision of all complaints initiated at the request of the Sheriff.

Investigation Procedures

- The Sheriff's Office Captain shall notify the employee to be investigated and the employee's Division Commander that an investigation is to be made except in cases where such notification would jeopardize the investigation. In the event the charged employee admits the violation with which he/she is

charged, the Sheriff's Office Captain shall prepare for the Sheriff a statement of the facts and submit their recommendation for disciplinary action to be taken, and shall give the entire file to the Sheriff for consideration, pursuant to the provisions of this policy. In the event the charged employee denies the violation(s) with which he/she is charged, then the investigation shall proceed as provided. With the approval of the Sheriff, a Division Commander may be assigned to investigate complaints at this level.

- The employee shall be given an opportunity to supply the investigator with evidence or witnesses favorable to him/her. No decision as to whether or not the employee violated the Rules of Personal Conduct, or Unsatisfactory Job Performance shall be made against a charged employee until the employee has had a reasonable opportunity to produce evidence or witnesses and has had an opportunity to explain his/her actions.
- If an investigation uncovers evidence of a possible criminal violation by an employee, Sheriff's Office Captain, shall immediately notify the Sheriff, who shall decide whether or not the appropriate authorities should be notified, or the appropriate law enforcement and/or take such other disciplinary or administrative action necessary consistent with the provisions of this policy.
- If an investigator uncovers evidence of additional violations of policy, an additional Personnel Complaint need not be completed. The employee must be informed of the allegations and must be given an opportunity to respond to the potential new charges.
- Upon completion of the investigation, the Sheriff's Office Captain or designee shall prepare for the Sheriff, a summary report of the investigation setting forth the facts of the case for review, and to determine the level of disciplinary action to be imposed.

Responsibility and Rights of the Employee under Investigation

- Employees under investigation for possible violations of the Rules of Personal Conduct, or Unsatisfactory Job Performance shall truthfully and fully answer all questions asked of them by the investigator concerning the incident being investigated.
- When a supervisor or investigator reasonably suspects that an employee has violated the Rules of Personal Conduct, or Unsatisfactory Job Performance, the supervisor or investigator may require the employee to submit to tests such as medical, ballistics, or chemical analysis or agree to participate in a lineup or be photographed. The employee may also be requested to furnish financial disclosure statements in connection with the case under investigation, after the approval of the Sheriff.
- When an employee is to be investigated for a non-criminal violation of the Rules of Personal Conduct, or Unsatisfactory Job Performance, the member

shall be notified that the investigation is to take place unless such notification would jeopardize the investigation.

- Any employee who is the subject of an internal investigation may be ordered by the assigned investigator to cooperate in the investigation and to appear before the investigator at a reasonable time and place to submit to questioning or other investigative procedures.
- Investigations conducted pursuant to this policy are for non-criminal violations or for violations that may be criminal but for which the purpose of the investigation is purely administrative in nature. Accordingly, the employee may be ordered to respond to questions which are narrowly and directly related to the matter under investigation. The employee shall not be permitted to have an attorney present during the questioning.
- County property under the control of the Vance County Sheriff's Office property may be searched at any time even if assigned to and used exclusively by an individual employee. An employee's personal property found on County-owned property or within a County owned vehicle may be searched at any time. All other personal property of an employee shall not be subjected to search and seizure except in accordance with law.
- An employee shall provide the investigator with any evidence and the names of witnesses who may have information about the matter under investigation.

A handwritten signature in black ink, appearing to read 'Peter White', is positioned above the printed name.

Peter White
Sheriff
Vance County

W Bullock – E.3 Workplace Harassment

Unlawful Workplace Harassment

Directive E.3

Effective 7/15/2009

I. POLICY

To provide a safe and healthful working environment for all employees and to provide a means for preventing, reporting, investigating, and resolving issues relative to any kind of unlawful workplace harassment.

It is the policy of Vance County Sheriff's Office that no employee may engage in conduct that falls under the definition of unlawful harassment in the workplace. All employees are guaranteed the right to work in an environment free from unlawful harassment in the workplace and retaliation. The Sheriff's Office prohibits its personnel from harassing clients, supervisors, colleagues, community representatives, subordinates, or other persons or groups with whom they have contact as representatives of the organization. The Sheriff's Office will promptly and thoroughly investigate all complaints made by an employee and will take appropriate remedial or disciplinary action up to and including dismissal.

II. DEFINITIONS

Unlawful Workplace Harassment is unlawful or unsolicited speech or conduct based on race, sex, creed, religion, national origin, age, color, or handicapping condition as defined by N.C.G.S. 168A-3 that creates a hostile work environment or circumstances involving quid pro quo. Action, words, jokes, or comments based on an individual's sex, race, color, national origin, disability, religion, age or other status protected by state or federal law will not be tolerated.

Handicapping Condition as defined by N.C.G.S. 168A-3 is "any condition or characteristic that renders a person a handicapped person".

Sexual Harassment is defined as unsolicited and unwelcome verbal and/or physical conduct of a sexual nature or with sexual implications by a supervisor or co-worker which:

- has or may have direct employment consequences resulting from the acceptance or rejection of such conduct;
- creates an intimidating, hostile, or offensive working environment; or
- interferes with an individual's work performance.

Sexual harassment does not include personal compliments welcomed by the recipient or relationships freely entered into by employees or prospective employees.

Hostile Work Environment is one that a reasonable person would find hostile or abusive and one that the particular person who is the object of the harassment

perceives to be hostile or abusive. Hostile work environment is determined by looking at all of the circumstances, including the frequency of the allegedly harassing conduct, its severity, whether it is physically threatening or humiliating and whether it unreasonably interferes with an employee's work performance.

Quid Pro Quo Harassment consists of unwelcome sexual advances; requests for sexual favors, or other verbal or physical conduct when:

- submission to such conduct is made either explicitly a term or condition of an individual's employment, or
- submission to or rejection of such conduct by an individual is the basis for employment decisions affecting such individual.

Retaliation is adverse treatment that occurs because of opposition to unlawful workplace harassment.

III. OPERATING PROCEDURE

Any employee or former employee who alleges unlawful workplace harassment or retaliation in violation of this policy may file a complaint through this section of this policy.

- This procedure applies to full-time or part-time employees with either a permanent, probationary, trainee or temporary appointment.
- Any employee who alleges unlawful workplace harassment must submit a written complaint to their Supervisor, Director of Human Resources, or the Sheriff within thirty (30) calendar days of the alleged harassing action.
- All of the following shall require investigation:
 - **Formal Complaints:** Formal complaints made either orally or in written form by any employee of the organization. Note that it should be considered as a legitimate complaint should an employee report harassing behavior directed not at him or herself but at others in the workplace. The complainant need not be the object of the alleged harassing activity.
 - **Informal Complaints:** Informal complaints are typically characterized by an employee who orally requests advice from a supervisor. These complaints may take the form of "I need advice" or "I don't want to file a complaint". Notwithstanding the employee's stated wishes, the supervisor/manager must consider this informal complaint as a "complaint" for purposes of Sheriff's Office policy. In this situation, it is necessary to thoroughly explain to the employee that the comments must be considered a complaint so as to ensure the eradication of any inappropriate behaviors and protection of the organization and other employees from this conduct.

- **Direct Observations:** Supervisors on all levels who directly observe potentially harassing conduct must consider these observations equivalent to any other form of "complaint". The investigation process is indicated where a supervisor or department head feels observed conduct may indeed represent prohibited behaviors.

IV. DISCIPLINARY ACTION

Disciplinary action taken against the harasser would typically range from a written warning, counseling, suspension from work, transfer to a different position, or termination of employment.



Peter White
Sheriff
Vance County

W Bullock – F.3 Arrest Procedures

Arrest Procedures

Directive F.3

Effective 7/15/2009

I. POLICY

This policy establishes guidelines and procedures for effecting arrest.

It shall be the policy of the Vance County Sheriff's Office to maintain procedures to be followed when effecting arrests, and shall apply to all Sheriff's Office employees with power of affect an arrest.

II. PROCEDURE

Authority for law enforcement officers to arrest without a warrant is provided in N.C.G.S. § 15A-401, "Arrest by Law Enforcement Officer".

- Deputies shall be aware that as a matter of Federal Constitutional, under Payton vs. New York, 445 U.S. 573 (1980), there is no longer any viable distinction between making a warrant-less felony arrest and a warrant-less misdemeanor arrest when that arrest involves entry into a person's home. A search warrant is required to enter a second party residence unless permission is granted, or during an emergency or exigent circumstance.
- A deputy may enter a suspect's premises to affect a lawful arrest in accordance with N.C.G.S. § 15A-401, when the deputy reasonably believes the person to be arrested is within the premises.
- A deputy may forcibly enter the premises, to affect a lawful arrest in accordance with N.C.G.S. § 15A-401, by announcing their authority, purpose, and making a demand for admission. The announcement and demand shall not be necessary if a deputy reasonably believes such announcement and demand might place the life of the deputy(s) in danger, or if the person to be arrested is attempting to destroy evidence or elude arrest.
- Before a deputy may arrest, it shall be established that probable cause exists. Probable cause can be established by a deputy's own observations, or through statements of witnesses or other law enforcement officers.
- Deputies shall check for local, DCI and NCIC warrants on all arrested persons transported to the detention facility.

Execution of Arrest Warrants

- Arrest warrants received for service can only be executed within the jurisdictional boundaries of Vance County by sworn employees.
- Each warrant must be confirmed prior to the actual arrest. Confirmation shall be as follows:

- Verification of an outstanding arrest warrant through NCIC/DCI or through Vance Central.
- Possession of the actual arrest warrant.
- Priorities of outstanding arrest warrants shall be as follows:
 - The service of warrants which may prevent the death or injury to the general public, witness or victims, shall have first priority over all other types of warrants.
 - The service of warrants for the arrest of capital or life felons and grand jury indictments shall be the second priority.
 - Felony warrants and all failure to appear warrants shall be the third priority.
 - Misdemeanor warrants, or when someone makes an inquiry regarding the service of a criminal action, shall be the fourth priority.
- The Sheriff or his/her designee shall determine which section shall be responsible for the distribution, processing, record keeping, filing and updates of warrants.
- See the "Criminal Process" policy for additional information.
- Transportation of persons arrested in another jurisdiction on a warrant or order for arrest, or juvenile pick-up order from this jurisdiction shall be conducted as follows:
 - Persons arrested under these circumstances shall be taken into custody from the local arresting agency and transported to the Vance County detention facility by the appropriate Sheriff's Office employee. This shall be done as soon as possible.
 - The Sheriff's Office Prisoner Transport personnel shall be the primary transporting source. When a Prisoner Transport member is not available, patrol units shall take custody and transport.
 - If a subject arrested pursuant to a Vance County warrant or juvenile pick-up order is injured during an arrest, the subject shall receive the appropriate medical screening/treatment prior to being transferred to the detention facility. Documentation of medical screening and/or treatment shall be provided to detention staff prior to transferring custody.
 - If the person arrested pursuant to a warrant or juvenile pick-up order has a pre-existing injury that was not caused by the arresting agency, then any treatment of that injury will be the responsibility of the individual.

- Arrests on out of state wanted person
 - When NCIC or DCI shows an outstanding warrant, confirm that the warrant is active with the originating agency and that the agency will extradite the subject.
 - Upon confirmation of an active warrant and intent of extradition, complete an affidavit for a fugitive warrant on the subject.
 - A "locate" shall be placed on the person via DCI
 - The subject shall then be arrested and placed in the detention facility and held for the requesting agency.
- Canceling Warrant Information
 - The arresting deputy shall contact his/her supervisor to remove the arrestee from DCI/NCIC or ensure the information is removed from NCIC/DCI themselves.
 - The warrant copy and/or arrest sheet shall be forwarded to warrant control for processing.
 - Warrant control shall return the canceled warrant to the Clerk of Court.

Stop and Frisk Law

- Law enforcement officers can utilize verbal contact with selected pedestrians and motorists as an effective crime prevention and information gathering tactic. Since the stop and questioning of citizens is restrictive on their freedom, certain guidelines must be established to regulate these procedures. (Terry v. Ohio, 1963)
 - The "stop" is the temporary detention and questioning of a subject for purposes of crime investigation or detection.
 - A deputy must have reasonable suspicion that a subject is committing, has committed, or is about to commit a violation of criminal law.
 - The stop and frisk law does not restrict law enforcement officers from approaching any person to engage in a voluntary conversation.
 - Detention shall not be longer than reasonably necessary and must terminate, if inquiry into the suspicious circumstances fails to produce probable cause or results in a reasonable explanation for the questioned activity.

- Subjects detained shall not be removed to another area without their consent or arrest.
- The “frisk” is intended for a deputy’s protection. Upon stopping a subject, if circumstances develop that causes a deputy to believe a subject is armed with a dangerous weapon, then a pat down or frisk is appropriate. When a deputy conducting a pat down search discovers an object “which mass or contour makes its identity immediately apparent,” the deputy is not required to ignore the contraband but is justified in seizing the object without a warrant. (Minnesota v. Dickerson, 1991)
- Factors to consider when deciding to frisk shall include:
 - If the suspected crime involves the use of weapons,
 - Unusual bulges in clothing that could be indicative of a concealed weapons,
 - The attitude or actions of the subject,
 - The availability of assistance, and/or the number of subjects being detained.
- This law shall not allow indiscriminate searching of a subject. The “frisk” is a pat down for weapons for the protection of a deputy only.
- Should the pat down reveal illegal weapons, the subject may be arrested and a more extensive search shall be conducted.
- Any stop and frisk shall be documented either in an incident report or field interview report.

Search and Arrest

- When a lawful arrest is made, the person being arrested and the area within the immediate presence of the person may be searched without a warrant to discover weapons and evidence for the purpose of protecting the deputy from attack, preventing the person from escaping, or discovering the fruits of the crime.
- A restriction imposed by the Supreme Court in *Chimel v. California*, 395 U.S. 752 (1969), requires that a search warrant be obtained first, if an arrest of a subject is anticipated at a subject’s home, office, or other premises, and a search of the entire premises is desired coincident with the arrest.
- N.C.G.S. § 15A-401. Arrest by law enforcement provides that the law enforcement officer may use force to enter the premises or vehicle if he reasonably believes that admittance is being denied or unreasonably

delayed, or if he is authorized under subsection (e)(1)(c) to enter without giving notice of his authority and purpose.

- N.C.G.S. § 15A-249 states the officer executing a search warrant must, before entering the premises, give appropriate notice of his identity and purpose to the person to be searched, or the person in apparent control of the premises to be searched. If it is unclear whether anyone is present at the premises to be searched, he/she must give the notice in a manner likely to be heard by anyone who is present.
- N.C.G.S. § 15A-251 states an officer may break and enter any premises or vehicle when necessary to the execution of the warrant if:
 - The officer has previously announced his identity and purpose as required by N.C.G.S. § 15A-249 and reasonably believes either that admittance is being denied or unreasonably delayed or that the premises or vehicle is unoccupied; or
 - The officer has probable cause to believe that the giving of notice would endanger the life or safety of any person.

If an Arrest is made in a House or Building, and No Search Warrant Exists

- A check shall be made of other rooms and closets of the premises for other wanted persons or accomplices, or to protect a deputy from possible attack.
- Items of evidence that are in plain view in the room where the arrest occurred, or in other rooms entered while looking for the subject or accomplices, may be seized.
- Other rooms, closets, or drawers shall not be searched for evidence. Neither is it permitted to conduct a search of files, suitcases, boxes and cabinets.
- If the subject is arrested outside the house or building, it is not permissible to take the subject into the building in order to search the inside of the premises.
- It is possible to obtain a valid consent to search the premises.

Arrest Made From Within a Motor Vehicle; Vehicle Searches

- If a deputy arrests an occupant of a motor vehicle, that deputy may, as an incident to the arrest, search the entire passenger's compartment of the vehicle and any containers therein, whether open or closed, without the requirements of probable cause. However, no search may be made of the luggage compartment incident to the same arrest unless there is independent probable cause (New York v. Belton, 1981; State v. Massenburg, 1984).

- If there is independent probable cause that a vehicle contains fruits or instruments of a crime or contraband, the entire vehicle including any containers may be searched (U.S. v. Ross, 456 U.S. 798, 1982).
- The Carroll Doctrine states when you have probable cause to believe an item subject to seizure is anywhere in the vehicle and exigent circumstances exist, then you can search the car and all containers therein without a search warrant. You can even have the vehicle towed and still search it later without a search warrant. The only time you will need a search warrant for a car under these circumstances is when it is parked on the curtilage of a dwelling and you cannot secure consent to search (Carroll v. U.S., 1925; State v. Isleib, 1987).
- When a deputy impounds a vehicle incident to an arrest, an inventory search of the vehicle shall be conducted.



Peter White
Sheriff
Vance County

W Bullock – F.13 Use of K-9s

I. POLICY

This policy establishes guidelines and procedures for supervision, operation, and utilization of Vance County Sheriff's Office Canines in accordance with Federal and State laws, to increase the effectiveness of the Sheriff's Office in the detection and apprehension of criminal offenders, the detection of hazardous devices, and the locating of missing persons or cadavers.

II. GENERAL

Trained Canines are a valuable law enforcement aid for use in evidence, hazardous device, drug detection, criminal prosecution, locating missing persons, and promoting favorable public relations. This directive addresses the procedures for the use of Canines, the request for service by members of the Vance County Sheriff's Office, other law enforcement agencies, and the use of controlled substance, explosive devices training aids.

All Canines will be secured on a lead at all times when outside of the Patrol vehicle unless the deployment process requires off-lead conditions (i.e. evidence/article search, area search).

III. APPLICATION

All personnel of the Vance County Sheriff's Office shall be subject to the provisions of this directive. Personnel are reminded that law enforcement canines are animals, and should not expect human responses to your actions. Canines used by this agency are not pets, and shall not be treated as such. Personnel not assigned and trained as a canine handler shall keep their distance, and do not attempt to pet any canine used for law enforcement purposes. Unless performed as part of a training exercise, teasing, agitating, or roughhousing with a Canine or the handler in the presence of the Canine is strictly prohibited.

Personnel not trained as a canine handler shall be prohibited to attempt or give any commands of any type to a law enforcement canine assigned to the Vance County Sheriff's Office.

Public displays (such as school demonstrations, civic clubs, etc.) to demonstrate the Canine's skills and abilities (including apprehension of another officer) may be conducted with the approval of the Supervisor in Charge or higher authority. All public displays or demonstrations will be conducted on-lead

The use of canines has proven to be a valuable asset to the law enforcement community. The Sheriff's Office maintains canine teams to support patrol and

detention operations, plus specialized units of this agency. Canine teams are also available to assist other agencies upon request.

It is the policy of the Sheriff's Office to use canines in a prescribed manner, as a supplemental and supportive tool, in order to effectively achieve the goals of the Sheriff's Office. It is the policy of the Sheriff's Office that canine teams be utilized for tracking, area searches, building searches, controlled substance searches, explosive detection, cadaver recovery, crowd control, seizing fleeing suspects, preventing escape and maintaining security, order and discipline in the detention center.

Canine handlers are reminded that a properly trained canine can constitute a use of force. In this, as in other cases, deputies may use that degree of force reasonably necessary to apprehend or secure a suspect, and all required "Use of Force" documentation may apply.

IV. RESPONSIBILITY

Canine handlers are sworn members, who have volunteered for this assignment. Deputies who handle canines are assigned regular duties and respond with their assigned canine on an "as needed" basis. Each handler shall answer to his/her immediate supervisor.

When canines are deployed for law enforcement operations, the on-site supervisor or his designee will assume command. The Sergeant in charge of the Special Enforcement Unit and Canines shall be responsible for the general use and deployment of all canine teams, and is responsible for the operational supervision of the dog handlers, training, and for authorizing specific uses and conditions under which the dogs operate.

Canine handlers are responsible for ensuring that his/her assigned canine is treated humanely, properly maintained, and is not used under circumstances which are unreasonably dangerous or unhealthy to the animal. The canine handler will be responsible for ensuring that their canine receives necessary veterinarian treatments as scheduled. He/she is also responsible for monitoring the performance of their canine for the purpose of determining the animal's overall well-being, as well as training needs.

When a canine handler is injured in the line of duty, or is out of work sick for an extended period of time, another trained canine handler may be contacted to take control and/or care for the canine in question until the injured or sick handler returns to full duty. The Supervisor in charge of canines or designee shall be responsible for ensuring that a handler with the appropriate training for the type of canine in question is contacted.

V. HANDLER REQUIREMENTS

The duties of handling a law enforcement canine are voluntary, and deputies who wish to volunteer must meet the following requirements to be considered. He/she must:

- Have completed their probationary period
- Be mature, patient, decisive, exhibit's self-control, good-natured, and have a professional personality.
- Reside in a home which provides a suitable environment, with ample space and yard to accommodate the canine and its kennel.
- Have a "Meets" or "Exceeds" expectations on the most recent performance appraisal.
- Not be under investigation, or have an active disciplinary action imposed against him/her.
- Be in good physical condition.
- Have a strong affection for canines.

VI. TRAINING

Canine teams shall receive a minimum of eight (8) hours training each month, or when deemed necessary by the supervisor in charge of canines. Training shall be conducted while on duty, in accordance with the schedule prepared by the supervisor in charge of canines.

The supervisor in charge of canines shall ensure that proper records are maintained, documenting training session, and shall prepare a monthly report of training activities. A copy of the monthly report shall be forwarded to the supervisor in charge of Training by the (5th) of each month.

It shall be the responsibility of the supervisor in charge of canines to ensure that all required canine certifications are maintained, with copies forwarded to the supervisor in charge of Training for filing.

Training Aids

- The maintenance of the Canine's detection proficiency requires controlled substance, and hazardous devices odors in training. To protect the integrity of the Sheriff's Office and the Canine Handler, the use of controlled substances and hazardous devices odors for training must be carefully monitored, and stored.

- Controlled substances used, as training aids will be obtained through the courts after final disposition of the cases. A court order must be prepared by the presiding judge of the case. The order will designate the controlled substance from the case to be used by the Vance County Sheriff's Office for canine training. All controlled substances will be obtained from cases in which the Sheriff's Office or a Federal Agency was the arresting entity. Prior to obtaining these training aids they must be tested and weighed by an approved laboratory.
- Hazardous devices odors used as training aids shall be obtained in strict compliance with Federal and State laws.
- The Canine Training Coordinator will be responsible for the custody of all controlled substances, and hazardous devices odors.
- The Canine Training Coordinator shall prepare and document the packaging of each controlled substance and hazardous device odors canine training aids. Canine training aid documents are maintained in the K-9 Trexx software, or other approved software, and will be used to record all information regarding the individual training aids.
- All controlled substance training aids will be secured in a separate storage locker within the appropriate Vance County Sheriff's Office, accessible only to the assigned Evidence Custodian or the alternate. The patrol vehicle trunk may be used for temporary storage (maximum of 24 hours unless an emergency prevents return to storage) during training periods.
- Canine Training Aid Annual Inventory form shall be completed documenting all controlled substances and hazardous devices odors on hand. This form must remain in the storage locker with the training aid for one (1) year from the date the inventory is conducted. When it is replaced with a new inventory, the original (expired) inventory shall be retained in the Canine Training Coordinators file for two (2) more years.
- The Canine Training Coordinator or his/her designees may have training aids in their possession only for training purposes and must obtain them from the Evidence Custodian from the locker in which they are stored. The Evidence Custodian Supervisor or the alternate will be responsible for signing out training aids and upon their release and return shall note the date, time, and item number on the appropriate form. The amounts shall be the same upon return as when checked out unless satisfactorily explained and documented. All training aids must be returned to the storage locker within 24 hours of removal unless emergency circumstances dictate otherwise. The Supervisor in charge of canines shall inspect all forms to assure proper retention and accounting of controlled substance training aids.
- The addition, loss, or destruction of any controlled substances, or hazardous device odors must be recorded and supported by proper documentation. Any unusual or substantial loss or any theft of a controlled substance or

hazardous device odors shall be immediately reported via the chain-of-command to the Canine Training Coordinator and the supervisor in charge of canines.

- Training aids should be replaced at yearly intervals (this is dependent on the availability of appropriated replacements). Training aids shall be destroyed by the Evidence Custodian Supervisor after conferring with the Canine Training Coordinator, and documented on the appropriate form. The original shall be maintained in the training aid storage locker for two (2) years, and then transferred to the Canine Training Coordinators file for two (2) years.
- Damaged controlled substance or hazardous devices training aids shall be recovered, destroyed and documented.
- At no time will any Canine Handler have in his/her possession any amount of controlled substances or hazardous device odor for the use of canine training unless authorized by the Canine Training Coordinator, or the supervisor in charge of canines.

VII. CANINE TEAM RESPONSE

Canine teams shall not respond to a situation where the canine is utilized for a purpose for which the handler or animal are not properly trained. The following categories are valid law enforcement responses for which canine teams may be deployed:

- All felonies and serious misdemeanor crimes where the suspect has fled on foot, and a canine team is requested for tracking.
- All burglary or robbery alarms, open door/window calls, or intrusion alarm calls where the canine team will be the primary building search unit.
- Assisting in locating lost individuals, including infants, children or disoriented elderly persons.
- Searching an area for discarded evidence or contraband.
- Searching for narcotics.
- Explosives detection.
- Land and water cadaver searches.
- Crowd control.
- Assistance at Detention Center.

- Any other call where, in the opinion of an on-duty supervisor, or the canine handler, a canine team would be an asset assisting another Vance County unit or other law enforcement agency, or serving as the primary unit. If the handler makes the decision to commit his/her canine, he/she must notify the on-duty supervisor.

VIII. DUTIES OF RESPONDING DEPUTIES

Responding deputies shall comply with the following procedures:

- Maintain a perimeter at any area or building to be searched by a canine team. Deputies assigned to perimeter locations will be moved in accordance with the progress of the canine team's search, or tracking efforts.
- Avoid contaminating the search area prior to the completion of the canine's search.
- Avoid entering a search area or building prior to the canine team's arrival. The supervisor in-charge shall ensure all members are out of the area prior to the canine's search, and that the contaminated area has been described to the canine handler.
- When the canine team enters a building or search area, another deputy shall be assigned to accompany the canine team. This deputy's responsibility is to provide cover for the canine team.

IX. CANINE UTILIZATION

Canine teams of the Vance County Sheriff's Office may be authorized to deploy their assigned canine for certain situation. The on-scene application of the canine is the responsibility of the canine handler.

Last minute mutual aid requests by jurisdictions outside Vance County shall be coordinated and approved through the on-duty supervisor.

Canine team vehicles shall not be used to transport prisoners. If a canine handler makes an arrest, he/she shall request a second unit for the purpose of transporting the prisoner.

Canines may be used in the Vance County Detention Center for the search of narcotics, contraband detection, and inmate control and cell extraction. This must be done in accordance with detention policy and approval from the on-duty detention supervisor in charge, or higher authority.

Use of Force by Canine

A trained Canine is a law enforcement tool and shall be used in conformance with the "Use of Force" Section IV, "Use of Less than Lethal Force".

All suspects shall be warned of the imminent use of a Canine in apprehension applications and should be afforded the opportunity to surrender if feasible. A canine may be released only if a lesser measures of force has failed and a order to surrender is given.

The requirement to warn a suspect three (3) times remains valid when the suspect's actions are normal and do not change, i.e. a person who continues to walk at a normal or accelerated pace in a direction that will not elude the canine team. The handler will announce: "Stop or I will release my dog".

If the handler is unable to announce the warning due to the speed in which the situation is developing, it will not preclude the use of the dog as long as all other requirements are met. If during the warning procedures the subject breaks and runs, the canine may be released to effect the apprehension, if the only other options would be for the subject to escape. A final verbal warning will be given to the suspect when the dog is released.

In housing areas, extreme caution must be used to avoid endangering innocent bystanders by reducing or minimizing the danger before releasing a canine.

If the suspect advances in a threatening manner towards the canine team, the canine will be released to protect the handler.

After the canine has been released to affect an apprehension, the handler will advance as rapidly as possible to regain control of the canine. This is to minimize injury to the suspect and to affect the apprehension. The handler must maintain sight of the canine at all times.

If a situation arises where the canine team is fired upon, the canine may either be released or restrained as the situation may dictate.

To check identification or affect an apprehension, the canine team shall advise individual(s)/suspect that the canine will attack with or without command upon any movement or display of hostility toward the canine team. The handler will have the individual(s)/suspect verbally acknowledge that the warning was understood.

Canines will not be released for apprehension of a suspect except under one or more of the circumstances listed below; and only then, when a verbal warning to "stop" has first been given, there are no bystanders situated in the direction of pursuit, and/or threat to bystanders are minimized. A lesser degree of force, in accordance with the "Use of Force" policy will first be considered before utilizing the canine.

- To apprehend a known, dangerous criminal.
- To apprehend a fleeing subject after proper challenge.
- To prevent the escape of a prisoner.

- To prevent injury or harm to the canine team.
- To prevent injury to other Law Enforcement personnel, members of the community, or personnel designated for protection.
- When directed by the lawful order of a superior authority.
- Assist with uprising in the jail, when approved by the Sheriff or designee.

The Canine shall not be used to prevent, deter, intimidate, or threaten any person or group of persons gathered for the purpose of exercising their constitutional rights in a **lawful** manner.

Building and Other Premises Searches

- One of the primary uses of canines, is to locate suspects hidden in buildings or related structures where search by deputies alone would create an unnecessary risk. These searches shall be governed by the following guidelines:
 - The use of canine teams for building searches is appropriate for those incidents where there is probable cause to believe that a felony suspect(s) or serious misdemeanor suspect(s), who poses a physical threat, may be concealed.
 - Probable cause may be formulated by a variety of means, such as an activated burglary alarm, witness testimony that a subject was observed entering a structure or conveyance, etc.
- During building searches, the perimeter of the building will be secured by law enforcement.
- Whenever possible, the owner or person in possession should be contacted to determine whether there may be tenants or others in the building and to ascertain the layout of the building.
- When using canines (Building Searches Only) trained for criminal apprehension, three (3) warnings will be given prior to entry.
- If a canine team is available to perform premises searches, and circumstances authorize such a search, the on scene / on-duty supervisor shall make every effort to utilize the canine team.
- When not a tactical disadvantage, the canine handler will keep outside units advised of his/her location when moving within the building.

X. TRACKING AND AREA SEARCHES

Because canines possess a superior sense of smell, this makes them suitable for tracking suspects who have fled from the scene of a crime and are actively engaged in efforts to elude capture. Canines are also available to search for other individuals such as lost children or adults.

The use of canine teams for detecting and locating is limited to the following situations:

- Fleeing suspects
- Arrestees
- Convicted persons
- Missing or lost individuals, and
- Cadaver recovery

When necessary, the canine team should be called to the scene or area to be searched as quickly as possible while the scent is still fresh. Upon waiting for the canine team's arrival on the scene or area to be searched, deputies and other persons should:

- Turn vehicle engines off
- Wait for the arrival of the canine team prior to beginning the search
- Avoid items that were or may have been touched by the suspect(s)
- Establish a path in and out of the area to be searched; and
- Control entry into the search area

Deputies or other law enforcement officers shall secure the perimeter while the canine team proceeds with locating a fresh trail for tracking. Only support personnel deemed necessary by the canine handler will enter the search area with the canine.

Contaminated areas should be pointed out to the canine handler prior to the trail attempt.

When not a tactical disadvantage, the canine handler will keep the perimeter units updated with the location and direction of the trail being tracked.

XI. NARCOTICS DETECTION CANINE

Narcotics detection canines are specially trained to locate and detect illegal narcotics and other controlled substances. The detector dog may be utilized in all aspects of narcotics interdiction to search buildings, premises, mail, freight, vehicles, vessels, trains, aircraft, etc. Because a drug detection alert is an aggressive alert; narcotics detection dogs shall **not** be used on a person or objects while on their body.

Prior to the canine conducting the search, all persons must be removed from the area to be searched.

All plain view drugs must be secured prior to the dog search.

XII. EXPLOSIVE DETECTION CANINE

Explosive detection canines are specially trained to locate and detect explosives and incendiary devices. The explosive detection canine may be utilized to search buildings, premises, mail, freight, vehicles, vessels, trains, aircraft, etc., for the purpose of locating explosive and incendiary devices and for tracking.

An explosive or incendiary device alert is a passive alert. Prior to the canine conducting the search, all persons must be removed from the area to be searched. If the dog alerts, the search will be stopped and the device removed or rendered safe by a Hazardous Device Unit technician before continuing the search.

XIII. CROWD CONTROL

The use of canines for the purpose of crowd control shall be in strict compliance with the following:

- Canines shall not be deployed at the scene of any lawful demonstration, picketing, or congregation.
- Canines may be used for crowd control if criminal rioting is occurring or imminent.
- Canines may be deployed as a back-up unit for public disturbance calls to protect law enforcement whose safety is jeopardized.
- Canines used in crowd control must be short leashed at all times unless the canine is used as force to prevent an imminent threat of death or serious bodily injury.

XVI. PROHIBITED USES

Canines shall not be used in areas and situations deemed by the handler to be unsafe.

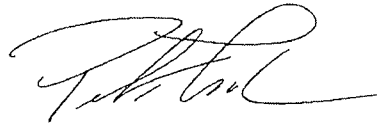
Canines shall not be used in an area or on any premises to which law enforcement does not have lawful access.

Canines shall not be used to search people or objects on their person.

Handlers shall not use their assigned Canine for intentional breeding purposes.

Handlers shall not enter their assigned Canine in **any** canine show or trial, without written permission from the Sheriff's Office Captain, or higher authority.

Canines will not be retired or, except in case of emergency, destroyed without court order or written authorization from the Sheriff. In cases other than by court order the destruction of the dog will require a complete report and in cases of euthanasia, justification from a veterinarian is required.

A handwritten signature in black ink, appearing to read 'Peter White', with a stylized, cursive script.

Peter White
Sheriff
Vance County

I. POLICY

This policy establishes guidelines and procedures for the execution of civil processes in support of the judicial function, according to current laws.

II. DEFINITION

Civil Process: A document issued by a court in support of the civil court system. The document encompasses any part of civil procedure, originating, supplemental, intermediate or final; and may include summons, subpoenas, writs, civil orders for arrest, domestic violence orders, involuntary commitment orders, notices, temporary restraining orders or the like.

In accordance with N.C.G.S. § 8-59, Issuance and Service of Subpoena shall be in compliance with state law and Rule 45 of the Rules of Civil Procedure for Civil Actions.

III. SERVICE PROCESS

The service of civil processes shall be performed by the Sheriff in accordance with N.C.G.S. § 162-13 thru 16.

Although most processes are served by the Civil Division or the Special Enforcement Unit, all sworn personnel are subject to being assigned to serve civil processes. Deputies assigned to the service of civil processes may primarily work shifts which are conducive to locating persons during normal working hours. If other arrangements are necessary to serve a particular paper, it may become incumbent on a deputy, detective, vice officer or other sworn member to assist with service. When this occurs, the assigned deputy shall accept the responsibility to make every reasonable effort to serve the process within the limits of the law and Sheriff's Office policy.

Under most conditions, deputies may only take action which is civil in nature by means of some court writ or order. Therefore, as a standard, when a civil process is being executed, the proper paperwork must be validly issued and received.

Deputies shall not take action in a civil procedure if, assisting a person who is repossessing a vehicle and this agency has no civil paper from the Court directing the Sheriff's Office to repossess the vehicle. In this case, the Sheriff's office would follow through with the repossession as spelled out in N.C.G.S. 1-308 through 313, Writs of Possession.

Listed below are references for deputies to use when handling or attempting to serve civil processes. Although this is not an all inclusive list, it is a list of the

W Bullock – F.5 Report of Separation



Eff. Jan 2018

NORTH CAROLINA DEPARTMENT OF JUSTICE
SHERIFFS' STANDARDS DIVISION

JOSH STEIN
ATTORNEY GENERAL

POST OFFICE BOX 629
RALEIGH, NC 27602 - 0629
TELEPHONE: 919-779-8213 FAX 919-662-4515

DIANE KONOPKA
DIRECTOR

REPORT OF SEPARATION

FORM F-5

☒ DEPUTY SHERIFF

☐ DETENTION OFFICER

INSTRUCTIONS: Please type or print all information clearly. This form shall be completed upon separation from one or both certified positions. This form must be submitted to the Commission **NO LATER THAN 10 DAYS AFTER FINAL SEPARATION**. A copy of this form must be retained in the appointing Agency's Personnel file.

SEPARATING AGENCY VANCE COUNTY SHERIFF'S OFFICE PHONE NUMBER (252) 738-2200

ADDRESS 156 CHURCH STREET, SUITE 004, HENDERSON, NC ZIP CODE 27536

OFFICER'S NAME JUSTIN JAMEL WHITE

(First)

(Middle)

(Last)

CURRENT HOME ADDRESS 130 CHAPPELL LANE, KITTRELL, NC 27544

DATE OF BIRTH 08/15/1989 SOCIAL SECURITY NUMBER 244-63-6901

DATE OF EMPLOYMENT: DEPUTY 06/05/2017 DETENTION OFFICER _____

POSITION/RANK DEPUTY SHERIFF

☒ Full-Time

☐ Part-time

DATE OF SEPARATION 10/24/2018

☐ Death

Was this separation a result of a criminal investigation or violation of Commission rules?

☐ YES ☒ NO

Are you aware of any on-going or substantiated internal investigation regarding this officer within the last 18 months?

☒ YES ☐ NO

I, as an official representative of this agency, do advise that the above-named officer has been separated from this agency on the date indicated herein. In addition, pursuant to the requirements of 12 NCAC 10B .0405(c), the officer has been notified of this separation as evidenced by his/her signature below or the attached letter. **IF this officer was ACTIVE between January and July, and did not complete the mandated In-Service Training, he/she must do so before becoming Active again. In addition, the obligation to notify the Sheriffs' Standards Division of criminal charges, domestic violence orders and civil no contact orders continues for one year from the date of separation.**

Signature of Sheriff or Registered Authorized Representative

Sheriff

Title

Date

"Signature on file"

Signature of Officer

Date

* (Officer has the right to submit a written statement of additional information to the Sheriffs' Standards Division upon separation)

W Bullock – J White Background Check Letters

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

June 7, 2017

Tonya C. Leggett
Clerk of Superior Court
Martin County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

MARTIN County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

VANCE COUNTY SHERIFF'S OFFICE

C/O CAPT W.W. BULLOCK

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

*Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page*

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Tracy A. Uhrin
Clerk of Superior Court
Merrimack County, NH

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

A handwritten signature in cursive script that reads "Capt. W.W. Bullock".

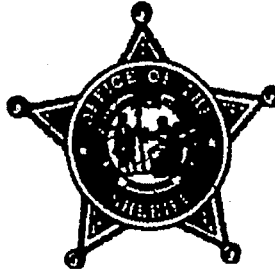
Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

W. Michael Scanion, Esq
Clerk of Superior Court North
Hillsborough County, NH

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

Office of the Sheriff Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Marshall Buttrick
Clerk of Superior Court South
Hillsborough County, NH

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

9505-05/15/17pm12:32

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Pamela B. Minshew
Clerk of Superior Court
Wayne County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock
Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

WAYNE County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Patricia B. Chastain
Clerk of Superior Court
Franklin County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

FRANKLIN County

In The General Court Of Justice
Before The Clerk

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC

☐ Assistant CSC

☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Jennifer J. Knox
Clerk of Superior Court
Wake County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

WAKE County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC

☐ Assistant CSC

☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Vasti F. James
Clerk of Superior Court
Bertie County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

BERTIE County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK
C/O VANCE COUNTY SHERIFF'S OFFICE
156 CHURCH ST STE 004
HENDERSON NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Michael J. McArthur
Clerk of Superior Court
Chowan County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

Capt. W.W. Bullock
Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

CHOWAN County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Katherine S. Cartwright
Clerk of Superior Court
Pasquotank County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

PASQUOTANK County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC

☐ Assistant CSC

☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

May 11, 2017

Todd W. Tilley
Clerk of Superior Court
Perquimans County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2207. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

PERQUIMANS County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

CAPT W.W. BULLOCK

C/O VANCE COUNTY SHERIFF'S OFFICE

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

June 7, 2017

Sarah Beth F. Rhodes
Clerk of Superior Court
Pitt County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

PITT County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

VANCE COUNTY SHERIFF'S OFFICE

C/O CAPT W.W. BULLOCK

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

AOC-CR-314, Rev. 3/07

© 2007 Administrative Office of the Courts

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

June 7, 2017

J.R. Rowell
Clerk of Superior Court
Union County, NC

RE: Justin Jamel White, BM, DOB 08/05/1989, NCOL# 30643245, SS# 244-63-6961

The Vance County Sheriff's Office is conducting a background on the referenced individual for employment purposes as a full-time Sworn Law Enforcement Officer. Please conduct a criminal background records check on behalf of the Vance County Sheriff's Office and mail the results to: Vance County Sheriff's Office c/o Capt. W.W. Bullock 156 Church Ste. Ste. 004 Henderson, NC 27536.

If you have any questions please call me at 252-738-2200. Thank you in advance.

Capt. W.W. Bullock

Capt. W. W. Bullock
Administrative Director
wbullock@vancecounty.org

TYPE OR PRINT IN BLACK INK.

STATE OF NORTH CAROLINA

In The General Court Of Justice
Before The Clerk

____ UNION _____ County

IN THE MATTER OF:

Name(s) By Which Individual To Be Searched May Be Known

JUSTIN JAMEL WHITE, BM, DOB 8/5/1989
NCOL# 30643245, SS# 244-63-6961

CRIMINAL RECORD SEARCH

G.S. 7A-109, -308(a)(17), -343(3)

☐ For DMV Hearing

REQUEST FOR CERTIFIED CRIMINAL RECORD SEARCH

I request that the Clerk of Superior Court conduct a search of the official records of the criminal cases in the courts of the county named above and certify the results of that search for the name(s) listed above. In making this request I understand and acknowledge that:

1. THE CLERK WILL SEARCH THE COURT RECORDS FOR ONLY THE COUNTY NAMED ABOVE. THIS IS NOT A STATEWIDE RECORD SEARCH.
2. Court records are indexed by name only and not by any other identifying characteristics.
3. The name(s) listed above are all the names by which, to my knowledge, the individual for whom I am requesting this search may be known.
4. The Clerk will search for records under all those names, but only for records under those names.
5. The fact that no criminal record is found under any of those names does not mean that the individual does not have a record in this county; the individual may have a record under another name.
6. The fact that a criminal record is found under one or more of those names does not mean that the record is a record for the individual for whom I am requesting this search; the record may be that of another individual with the same or a similar name.
7. I am solely responsible for any interpretation and use I make of the results of this search and I understand the Clerk is not responsible for my interpretation or use of the results.

Name And Address Of Requestor (Including City, State And Zip Code)

VANCE COUNTY SHERIFF'S OFFICE

C/O CAPT W.W. BULLOCK

156 CHURCH ST STE 004

HENDERSON

NC 27536

Signature Of Requestor

Capt. W.W. Bullock

CERTIFICATION

This is to certify that I have searched the indices to criminal actions in this office from _____ to the present and

- ☐ I have found that no record was indexed by the name(s) given above.
- ☐ I have found the following excerpt(s) from the public records indexed by the name(s) given above as appears in the attached _____ page(s).
- ☐ This search is limited as follows: _____

Some automated system information code definitions are included on the back of this form to help you understand the record(s) that may be attached to this form.

*Not Valid Without The
Clerk Of Superior Court's Raised Seal
On Each Page*

Date Of Search

Signature

☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court

NOTE: "Any person who without lawful authority intentionally ... alters or changes any ... official case record is guilty of a Class H felony." G.S. 14-221.2.

(Over)

W Bullock – J White Use of Force Investigation



156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Office of the Sheriff

Vance County

EXHIBIT "A"



Telephone 252-738-2200
Fax 252-738-2220

Sheriff Peter White

ADMINISTRATIVE INVESTIGATION

COMPLAINANT: LATWANYA S. OLIVER

ACCUSED: DEPUTY JUSTIN WHITE

INVESTIGATING OFFICER: CAPTAIN W.W. BULLOCK

PREPARED BY: CAPTAIN W.W. BULLOCK *WJB*

NATURE OF COMPLAINT: USE OF FORCE

CASE SYNOPSIS:

On Sunday, October 21, 2018 @ 2000hrs Deputy White was on patrol near the N. Garnett St area when he observed a car traveling north on Garnett Street at a speed greater than the posted speed limit. According to White, the vehicle at one point nearly rear-ended another vehicle while traveling north on Norlina Rd. White stated he ran the vehicle registration thru 911. The dispatcher gave him the registration information, White stated 10-4, any 29s, the dispatcher immediately replied negative. White stated to me in the presence of Capt. Watkins he specifically asked for warrant information on the registered owner, but the 911 tape revealed he didn't. White continue to follow the vehicle onto Warrenton Rd from Norlina until the vehicle pulled into the lot of the Shell Station on Warrenton Rd. White pulled into the lot from the Carey Chapel Rd side, never activated his blue lights, but engaged in conversation with the driver, Latwanya Oliver, while he remain in his patrol vehicle. According to White, Oliver became irritated when he drew attention to her previous speed. The two of them exchanged conversation, but Oliver walked away from White. Some point shortly afterwards, White returned to the Sheriff's Office to check for warrants on Oliver. According to White, 911 dispatch has often failed to verify warrants on wanted people he has requested a warrant check. White discovered that Ms. Oliver had 2 outstanding felony warrants.

On Monday, October 22, 2018 @ 0152hrs, White went to 52 Daisy Lane Henderson, NC (see included CFS Report# 1810-049292) and check out at this location as 10-63 (Investigation). White clear the scene approximately 13 mins later. According to White, he knocked at the front and rear door, but no one responded. According to Oliver, someone came to her house @ 0200hrs knocking on the door. She thought it was a friend of hers, and didn't respond. Even though White checked out on an investigation, his intent was to serve the outstanding warrants.

Prior to White going to the residence, he asked Sgt. Welborn to accompany him, but Sgt. Welborn told him no.

White came back to work on night shift on Monday, October 22, 2018 for his 1800-0600hrs duty shift. White returned to 52 Daisy Lane Henderson NC and check out at this location for 10-29 service @ 2016hrs (see included CFS Report# 1810-049445). According to White he identified himself as Deputy White and told Oliver she had a warrant for her arrest. Oliver cooperated with White's instructions until he tried to handcuff her when he got to his patrol vehicle. White said at the point "All hell broke loose". White was able to get 1 handcuff on Oliver. White said (in summary) Oliver began pushing her weight towards his body, pulling away from him, struck his legs 2x leaving a red mark on him, and was failing to obey his request; refusing to get into his patrol car. White stated he performed a takedown maneuver (according to Oliver in effect slamming her to the ground) which he stated was an approved subject control technique (See included Incident Report 18013870). According to Oliver, White slammed her down without his weight upon her, and then cuff her while she was on the ground. While interviewing White in my office with Capt. Watkins as a witness, I asked White what takedown maneuver he was referring to? He stated he didn't know the name of it. Deputy White asked me if there were any other incidents with this agency where someone's arm was broken. I told him I could not recall any incident to that extent.

While Oliver was on the ground, White was able to get the second handcuff on her. She immediately started complaining about her arm being broken. While she was handcuffed on the ground, White radioed in a loud panic voice "S33 Central send me some units to my location". Units acknowledged the traffic and responded code 3 (10-18) towards his location. White then stated "33 Central run um EMS emergency traffic as well have them stage". You could hear someone moaning in the background of his radio traffic. When 911 Dispatch asked could he provide reference (nature of needing EMS), White stated "10-4 use of force Central they will receive further when they get here". White never did acknowledge to the responding units the true nature of his request, and the responding LEO's thought he had shot someone. It was only when Sgt. Welborn arrived on scene the urgent nature of the request was downgraded. Lt. Goolsby and Sgt. Welborn stated Oliver was some distance away from the patrol vehicle when they arrived. This would suggest Oliver was slung downward in a slamming motion away from the patrol vehicle. White stated in his report that Oliver stated a frivolous verbal complaint against him. He was referring to a comment Oliver made to Lt. Goolsby when he arrived on scene. After several examinations of her arm, EMS determined Oliver' left arm was broken; therefore, she was transported to MPMC.

White was instructed to return to the office and start his paperwork, while Lt. Goolsby and Sgt. Welborn went to MPMC. According to MPMC records, Oliver sustained fracture of the Humerus (see After Care Instructions). White determined that Oliver should be charged with Felony Physical Injury to LE and Felony Obstructing Justice; along with the 2 outstanding warrants for Felony Obtaining Property by False Pretense

ILLUSTRATIONS:

Incident Report 18013870
Use of Force Report



Statement of Lt. Goolsby
Statement of Sgt. Welborn
CFS Report 1810-049445
CFS Report 1810-049292
Disk of 911 recording
After Care Instruction from MPMC for Latwanya Oliver
Statement of Latwanya Oliver

CONCLUSION:

Deputy White's actions throughout this process appeared to be over heightened in nature. Deputy White seemed overly excited with his request for assistance, causing responding units to be put at a greater risk of danger than necessary; at a point where Oliver was completely detained only needed non-emergency treatment. Deputy White's Use of Force appear to be contrary to Use of Force Directive B.9 I. Policy " it is the policy of the Vance County Sheriff's Office that deputies shall use only that force which is reasonably necessary to effectively bring an incident under control...." Deputy White could have used other options prior to slamming Oliver to the ground. Deputy White has mace at his disposal, but believed it to be ineffective because Oliver was wearing glasses and moving uncontrollably. Deputy White's "take down" maneuver was contrary to policy in that it cause a fracture of the Humerus bone in her left arm.

RECOMMENDATION:

It is the recommendation of Capt. Watkins, Lt. Goolsby, Sgt. Welborn and the Investigator Officer that Deputy Justin White' service with the Vance County Sheriff's Office is no longer needed.



Use of Force

Directive B.9

Effective 7/15/2009

I. POLICY

This policy establishes guidelines related to the use of force, reporting, review, and analysis.

The Vance County Sheriff's Office recognizes and respects the value and special integrity of each human life. By vesting deputies the lawful authority to use force to protect the public welfare, a careful balancing of all human interests is required. Therefore, it is the policy of the Vance County Sheriff's Office that deputies shall use only that force which is reasonably necessary to effectively bring an incident under control while protecting the lives of the officer or another. Deputies shall use physical force in arrest and custody situations only in strict conformance with the United States Constitution, laws of North Carolina, and this policy.

Approved Weapons

- A deputy shall, while on or off duty, only carry weapons and ammunition authorized or approved by the Sheriff.

Impact Weapons

- The riot and expandable (ASP) batons are the only impact weapons issued to deputies of the Vance County Sheriff's Office. Deputies must complete the appropriate training prior to receiving authorization to carry or use these weapons.

Chemical Agents

- Only Sheriff's Office issued chemical agents may be carried and used by deputies of the Vance County Sheriff's Office.
- Prior to the issuance of Oleoresin Capsicum Spray (OC Spray), all deputies shall receive training in its use, which will include instruction and actual application to afford the deputy an understanding of the effects. Any use of OC Spray other than in a training situation or spraying of animals for self-protection shall be reported as required by this policy.

Use of Other Chemical Agents

- Authorization to employ tear gas or other chemical agents in riot situations or for other applications involving large numbers of people must be obtained from the Sheriff's Office Captain or higher authority or his/her designee. Any use of tear gas or chemical agents except in a training situation must be reported on the appropriate Incident Report.



ARREST REPORT

AGENCY INFO.	Agency Name VANCE COUNTY SHERIFF'S OFFICE		ORI NC0910000	Date/Time of Arrest Mo: 10 Day: 22 Year: 2018 Hrs: 23:23		OCA 18013871	
	<input type="checkbox"/> Taken <input type="checkbox"/> Prints <input type="checkbox"/> Photos	Fingerprint Card Check Digit # (CKM)	Arrest Tract	Residence Tract	Arrest Number 1		
ARRESTEE INFORMATION	Name (Last, First, Middle) OLIVER, LATWANYA SHAWNTEL			D.O.B. 02/05/1977	Age 41	Race B	Sex F
	Current Address 52 DAISY LANE, HENDERSON, NC 27537			Phone (919) 514-7885	Occupation	<input checked="" type="checkbox"/> Resident <input type="checkbox"/> Unknown <input type="checkbox"/> Non-Resident	
	Employer's Name PACIFIC COAST FEATHERS			Address 100 COMFORT DR, Henderson, NC 27536		Phone (252) 436-2300	
	Also Known As (Alias Names) OLIVER, LATWANYA L, HENDRICKS, LATWANYA SHAWNTEL; He			Hgt 507	Wgt 275	Hair BLK	Eye BRO
	Social Security # 239-25-2354			OLN and State 28617872 NC	Mile. # and Type		
	Nearest Relative Name			Address		Phone	
ARREST INFO.	If Arrested, Type of Weapon 97 - Not Applicable/None		<input type="checkbox"/> On-View <input type="checkbox"/> Criminal Summons <input type="checkbox"/> Order for Arrest <input type="checkbox"/> Citation <input checked="" type="checkbox"/> Warrant		Place of Arrest MAGISTRATES OFFICE, Henderson, NC 27536		
	Charge #1 Obtaining Property by False Pretense	<input checked="" type="checkbox"/> Fel <input type="checkbox"/> Misd	Counts 2	DCI Code 1120	Offense Jurisdiction (If not arresting agency)	Statute # 14-100	Warr. Date Mo: 11 Day: 03 Yr: 2017
	Charge #2 ASSAULT PHY INJ LE/PROB/PAR OF	<input checked="" type="checkbox"/> Fel <input type="checkbox"/> Misd	Counts 1	DCI Code 0811	Offense Jurisdiction (If not arresting agency)	Statute # 14-34.7C1	Warr. Date Mo: 10 Day: 22 Yr: 2018
	Charge #3 OBSTRUCTING JUSTICE	<input checked="" type="checkbox"/> Fel <input type="checkbox"/> Misd	Counts 1	DCI Code 2690	Offense Jurisdiction (If not arresting agency)	Statute # COMMON LAW	Warr. Date Mo: 10 Day: 22 Yr: 2018
VEH. INFO.	VYR	Make	Model	Style	Color	Lot/Ln	Vin
	Vehicle: 1. <input type="checkbox"/> Left at Scene <input type="checkbox"/> Secured <input type="checkbox"/> Unsecured Date/Time _____ Hrs _____ 2. <input type="checkbox"/> Released to other at owner's request <input type="checkbox"/> Name of Other _____ 3. <input type="checkbox"/> Impounded <input type="checkbox"/> Place of Storage _____ Inventory on File? _____						
CONFINED BOND INFO.	Date/Time Confined 10/22/2018 23:30 Hrs		Place Confined VANCE COUNTY JAIL		Committing Magistrate COWAN		
	Type Bond <input type="checkbox"/> Written Promise <input type="checkbox"/> Unsecured <input checked="" type="checkbox"/> Secured <input type="checkbox"/> No Bond <input type="checkbox"/> Other	Amt. Bond \$15,000		Trial Date 11/19/2018	Court of VANCE DISTRICT	City HENDERSON	
	Assigning Officer Name/ID Number		Released By: Name/Dep/ID		Date/Time Released Hrs		
DRUGS AT TIME OF ARREST	Status Codes: L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Banned C = Counterfeit / Forged F = Found (Check "DU" column if recovered for other jurisdiction)						
	DCI	Status	Quantity	Type Measure	Suspected Type	Check up to 3 types of activity for each	
						Possess	Buy Sale Mfg. Importing Operating
COMPLAINANT	Name: Complainant <input type="checkbox"/> Victim <input type="checkbox"/>			Address:		Phone:	
	NARRATIVE ON 10/22/18, 2300 HOURS APPROXIMATELY I SERVED THE AFOREMENTIONED CHARGES AT THE MAGISTRATES OFFICE DUE TO INJURY ARISING OUT OF THE USE OF FORCE, SAME WAS GIVEN AN UNSECURED BOND. THE MAGISTRATES WAS TRANSPORTED MARIA PARHAM HOSPITAL TO DO THE INITIAL APPEARANCE.						
STATUS	Arresting Officer Signature/ID # DEPUTY J. J. WHITE 259		Date/Time Submitted Mo: 10 Day: 23 Year: 2018 Hrs: 6:00		Supervisor Signature		
	Case Status: <input type="checkbox"/> Further Inv. <input checked="" type="checkbox"/> Inactive <input type="checkbox"/> Closed		Case Disposition: <input checked="" type="checkbox"/> Cleared By Arrest / No Supplement Needed <input type="checkbox"/> Arrest/No Investigation		Arrestee Signature		

DCI-608F

Rev. 3/92



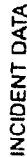
Division: Patrol	Computer Number #259	Rank / Name (First, M.I., Last)
Patrol Division	259	Justin J White

Statement

On 10-22-18, 2016 hours, I notified dispatch of a warrant service at 52 Daisy Lane, Henderson, NC 27537. I knocked on the front door and I heard a female ask, who is it? I identified myself as Deputy White with the Vance County Sheriff's Office. The female asked again, who is it? I re-advised the aforementioned. The female stated, I don't believe you, shine your light so I can see you. I adhered to her request and she said, oh ok and opened the front door. The female turned out to be Ms. Latwanya Shawntel Oliver, who was wanted on 2 felony counts of obtaining property by false pretense. Prior to going to the residence, I asked dispatch to verify the felony warrants and they advised same were active. I told Ms. Oliver she had felony warrants and she stated, Lawd, what have I done-I aint done nothing wrong. I stated, you are under arrest and will find out further at the magistrates office. Ms. Oliver stated, I haven't done nothing-can I call my daughter and let her know? I told her she can make a phone call at the station. She said, well, ok, let me get my keys, turn off my lights, lock up my house and stuff. Can I do that? Because you are just ugh. I replied, yes, you can do that. Ms. Oliver turned off some of her lights and walked out of the front door and I asked, aren't you going to lock up and she turned around and said, I forgot, let me get my keys of the dresser and she said we are going to have to go out of the back door because something is wrong with the front door. When we walked out of the back door, she did not pull it all the way through and I pulled it for her and asked, do you have a deadbolt key and she said yes but something is wrong with it. As she was approaching my patrol vehicle, I told her to stop and submit to the handcuffs. She replied, why do you have to handcuff me? I told her it is for my safety as well as yours (standard procedure). I was able to get one handcuff on her and she became irate and would not comply with my lawful orders. She screamed to the top of her lungs help, help, help me- your not taking me anywhere until' I see some papers-I'm not going anywhere. I told her to calm down and that she was making the situation worst. I told her cooperation goes along way with law enforcement when you go before the magistrate or judge. Ms. Oliver stated, ok, sir, I apologize. I went to handcuff the second arm and she went crazy, she lost it. She pulled away from me while saying no, no, I'm not going, leave me alone. I placed her up against my car, opened the rear passenger door instructed her to get in and she became extremely combative by yelling no, I'm not going no where, help, help. She pushed her body against mines and struck me in the lower leg twice. I performed a takedown maneuver, which is an approved subject control technique. To prevent additional manipulation of the handcuffs, I tightened them while on the ground. Ms. Oliver stated, you broke my arms, oooowwwwwww, oooowwwwwww my arms are killing me, they are hurting sir, I think my arms are sprained, I'm in so much pain. I immediately radioed for EMS 10-18 due to injuries sustained from a use of force (2024 hours). Prior to, I called for backup at 2022 hours. Sgt. Welborn arrived on scene first as back up and I told him, she has felony warrants, refused to comply, pulled away and assaulted me. EMS arrived and stated, her arm is not broke because she can move her shoulders. Ms. Oliver continued to scream in pain and the EMS



Supervisor re-examined her arm and said, yep, it is broken. Ms. Oliver was transported to Maria Parham Hospital in Henderson, NC for further medical treatment. I acted in good faith to arrest Ms. Oliver and when she refused I took action as authorized. I used reasonable force to achieve the law enforcement objective and to gain compliance and to ensure public safety. I afforded her every opportunity to comply with my lawful orders and she refused. I do not have a taser and pepper spray would have been ineffective as she was moving uncontrollably and had glasses on, which would have caused same to ricochet (more likely than not). Officer presence and verbalization did not work. Thus, I had to go hands on. I made a good faith effort to maintain and restore order. I followed the objective reasonableness standard under the 4th Amendment to arrest the defendant and to seize her person due to the outstanding felony warrants notwithstanding other violations of law (assault on a law enforcement officer and resisting arrest). It should be noted, Ms. Oliver has a record of communicating threats, simple assault and assault with a deadly weapon (aggravating factors on her part and mitigating factors for me). Ms. Oliver filed a verbal frivolous complaint against me for pulling her over and harassing her at the Shell Gas Station on Warrenton Road. I did not pull her over, I never turned on my lights and sirens. I noticed a car traveling at a high rate of speed on North Garnett Street passing Parker and Bickett Streets, Old Norlina Road and Spring Valley Drive. On 10-21-2018, 2130 hours approximately, I was patrolling Old Norlina Road going towards Main Street (the intersection of Garnett, Beckford, Main and Chestnut). The vehicle was clearly exceeding safe speed. I brought my vehicle up to 60 mph and had trouble keeping up with her in a 35 MPH Zone. It was not until she almost rear-ended a dark in color truck at the Handy Mart beside Forsyth Skippers that she slowed down but picked the speed right back up. It should be noted, she has a horrible DMV record, 15 speeding tickets, various running a red light/stop signs and several accidents. Had I known this at the time, I would have pulled her and took appropriate action. I ran the tag, which came back active and valid. I asked dispatch to run the registered owner for warrants, which came back negative. Ms. Oliver pulled into the Shell Gas Station and I pulled around to the Carey Chapel Road entrance for the station and saw her exit the vehicle (FFS-2692) and told her to slow it down and to watch her speed. I was trying to have open dialogue with her (community oriented policing) and she started screaming and yelling for no reason, I know my rights, you should have pulled me back there and wrote the ticket, I know my rights. I advised her it was not too late to write the ticket but I'm trying to talk to you about not speeding in the future. She said, well, write the ticket then and you have a good day. Due to dispatch failing to properly do a warrant check (public safety issue), I was unaware she had felony warrants. It is unfortunate that injuries occurred, however, I have a job to do and the general welfare of the public is first and violators must be apprehended pursuant to standard operating procedures, general statute, common law and judicial precedent (state and federal case law). See Use of Force Report. This is an account of what happened and I reserve the right to amend this statement (addendum) as the situation happened so quickly.



OCA										
18013870										
Date / Time Reported				S	M	T	W	T	F	S
Month	Day	Yr	Time							
10	22	2018	20:16	Hrs						
Last Known Secure				S	M	T	W	T	F	S
Month	Day	Yr	Time							
10	22	2018	20:14	Hrs						

#1	Crime / Incident(s)	<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete	At Found	S	M	T	W	T	F	S	10	22	2018	20:16	Hrs
	9910 - WARRANT SERVICE		Month	Day	Yr	Time	Last Known	Secure	S	M	T	W	T	F	S
#2	Crime Incident	<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete	Location of Incident	10	22	2018	20:15	Hrs	10	22	2018	20:14	Hrs	Offense Tract	
	52 DAISY LN, HENDERSON, NC 27537		2												
#3	Crime Incident	<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete	Premise Type	Victim Residence Type											
	01 - Home of Victim - Single Family Dwelling		<input type="checkbox"/> Single Family <input type="checkbox"/> Multi Family												

How Attacked or Committed		<input checked="" type="checkbox"/> Home of victim - Single Family Dwelling <input type="checkbox"/> Single Family <input type="checkbox"/> Multi Family	
BY ATTEMPTING TO SERVE A WARRANT		Forcible <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> No	Weapon / Tools

# of Victims	Type: <input type="checkbox"/> Person <input type="checkbox"/> Business		Injury: <input type="checkbox"/> None <input type="checkbox"/> Minor <input type="checkbox"/> Loss of Teeth		Drug/Alcohol Use:				
1	<input type="checkbox"/> Society <input checked="" type="checkbox"/> Government <input type="checkbox"/> Financial Institute		<input type="checkbox"/> Broken Bones <input type="checkbox"/> Severe Lacerations		<input type="checkbox"/> Yes				
	<input type="checkbox"/> Religious <input type="checkbox"/> L.E. Officer Line of Duty <input type="checkbox"/> Other/Unk		<input type="checkbox"/> Internal <input type="checkbox"/> Unconscious <input type="checkbox"/> Other Major		<input type="checkbox"/> No <input type="checkbox"/> N/A				
V1	Victim/Business Name (Last, First, Middle)			Victim of Crime #	DOB / Age	Race	Sex	Relationship To Offender	Resident Status
	STATE OF NORTH CAROLINA			1					<input type="checkbox"/> Resident
Home Address									<input type="checkbox"/> Non-Resident
									<input type="checkbox"/> Unknown

Home Address										<input type="checkbox"/> Unknown	
										Home Phone	
Employer Name/Address										Business Phone	

VYR	Make	Model	Style	Color	Lic/Lis	Vin
2000						

CODES: V = Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)

Type: ☐ Person ☐ Business ☐ Society ☐ Government ☐ Financial Institute ☐ Religious ☐ L E Officer Line of Duty ☐ Other/Unknown

Name (Last, First, Middle)

Code R	Name (Last, First, Middle)				Victim of Crime #	DOB / Age	Race	Sex
	WHITE, JJ							
Home Address								

Home Address						B	M
							Home Phone
Employer Name/Address							

Employer Name/Address VANCE COUNTY SHERIFF'S OFFICE - 156 CHURCH ST, Henderson, NC 27536	Business Phone (252) 738-2200
---	----------------------------------

Type: <input type="checkbox"/> Person <input type="checkbox"/> Business <input type="checkbox"/> Society <input type="checkbox"/> Government <input type="checkbox"/> Financial Institute <input type="checkbox"/> Religious <input type="checkbox"/> L.E. Officer Line of Duty <input type="checkbox"/> Other/Unknown	
Code	Name (Last, First, Middle) _____ Victim DOB / Age _____ Page _____

<div> <div> R </div> <div> Name (Last, First, Middle) WELBORN, C M </div> </div>	<div> Victim of Crime # </div>	<div> DOB / Age </div>	<div> Race </div>	<div> Sex </div>
---	--------------------------------	------------------------	-------------------	------------------

Home Address							
156 CHURCH STREET, HENDERSON, NC 27536						Home Phone (252) 738-2200	

Employer Name/Address	(252) 738-2200
	Business Phone

= Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found
Check "OJ" column if recovered for other jurisdiction)

[illegible]

Number of Vehicles Stolen	0	Number of Vehicles Recovered	0
---------------------------	---	------------------------------	---

Officer Name	ID#	Officer Signature	Supervisor Signature
DEPUTY J. J. WHITE	259	[Signature]	[Signature]

Complainant Signature	Case Status	Case Disposition:
	<input checked="" type="checkbox"/> Further Investigation <input type="checkbox"/> Inactive <input type="checkbox"/> Closed/Cleared <input type="checkbox"/> Closed/Leads Exhausted	<input type="checkbox"/> Unfounded <input type="checkbox"/> Juvenile/No Custody <input type="checkbox"/> Extradition Declined <input type="checkbox"/> Cleared by Arrest <input type="checkbox"/> Refuse to Cooperate <input type="checkbox"/> Located <input type="checkbox"/> Cleared by Arrest by Another Agency <input type="checkbox"/> Death of Offender <input type="checkbox"/> Prosecution Declined



INCIDENT/INVESTIGATION REPORT

Page 2

OCA
18013870

Status Codes	L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found												
DRUGS	DCI	Status	Quantity	Type Measure	Suspected Type			Check up to 3 types of activity for each					
								Possess	Buy	Sale	Mfg.	Importing	Operating
OFFENDER	Offender Used Alcohol/Drugs <input type="checkbox"/> Yes <input type="checkbox"/> Unk <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		Offender 1 Age: 41 Race: B Sex: F		Age: Race: Sex:		Age: Race: Sex:		Age: Race: Sex:		Primary Offender Resident Status <input checked="" type="checkbox"/> Resident <input type="checkbox"/> Non-Resident <input type="checkbox"/> Unknown		
	Computer <input type="checkbox"/> Yes <input type="checkbox"/> Unk <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		Age: Race: Sex:		Age: Race: Sex:		Age: Race: Sex:		Age: Race: Sex:				
SUSPECT	Name (Last, First, Middle) OLIVER, LATWANYA SHAWNTEL				Alias or Nickname LATWANYA L OLIVER ; LATWANYA SHA				Home Address 52 DAISY LANE, HENDERSON, NC 27537				
	Occupation				Business Address PACIFIC COAST FEATHERS - 100 COMFORT DR, Henderson, NC 27536								
	DOB / Age 02/05/1977 41		Race B	Sex F	Height 5'07"	Weight 275	Build	Hair Color BRO	Hair Style STR	Hair Length LNG	Eye Color BRO	Glasses Yes	
	Scars, Marks, Tattoos, or other distinguishing features (i.e. limp, foreign accent, voice characteristics)												
	Hat	Jacket	Shirt/Blouse	Tie/Scarf	Coat/Suit	Pants/Dress/Skirt	Socks	Shoes					
	Was Suspect Armed?		Type of Weapon				Direction of Travel			Mode of Travel			
	VYR	Make	Model	Style	Color	Lic/Lis	Vin						
WITNESS	Name (last, first, middle)				DOB / Age		Race	Sex	OCA				
	Home Address				Home Phone		Employer			Phone			
	Suspect Hate / Bias Motivated: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>												
NARRATIVE	Narrative												
	CFS # 1810-049445												
	MSHEARIN6865 - 2018-10-22 20:22:50												
	S33ADV SEND HIM SOME UNITS AT HIS LOCATION												
	MSHEARIN6865 - 2018-10-22 20:24:56												
	S33 IS REQUESTING EMS 10-18 TRAFFIC REF USE OF FORCE												
	JCROTTY9997 - 2018-10-22 20:39:55												
	OLIVER, LATWANYA SHAWNTEL 02/05/1977 BLACK FEMALE 26617872 NC 52 DAISY LN												
	HENDERSON, NC 27537-3095 239-25-2354 VANCE												
	17CR53133 WARRANT FOR ARREST OBTAIN PROPERTY FALSE PRETENSE NO NO NCAWARE ELECTRONIC												
	98 OLIVER, LATWANYA SHAWNTEL 02/05/1977 BLACK FEMALE 26617872 NC 52 DAISY LN												
	HENDERSON, NC 27537-3095 239-25-2354 VANCE												
	17CR53134 WARRANT FOR ARREST OBTAIN PROPERTY FALSE PRETENSE NO NO NCAWARE ELECTRONIC												
	CAD Disposition = B ARREST MADE												
	On 10-22-18, 2016 hours, I notified dispatch of a warrant service at 52 Daisy Lane, Henderson, NC 27537. I knocked on the front door and												
I heard a female ask, who is it? I identified myself as Deputy White with the Vance County Sheriffs Office. The female asked again, who is it?													
I re-advised the aforementioned. The female stated, I don't believe you, shine your light so I													



CONTINUATION PAGE

1. AGENCY VANCE COUNTY SHERIFF'S OFFICE	2. ORI NC0910000	3. CONTINUATION TO: <input checked="" type="checkbox"/> INVESTIGATION <input type="checkbox"/> ARREST <input type="checkbox"/> SUPPLEMENTARY INV.	4. OCA FILE NO. 18013870
<p>Narrative can see you. I adhered to her request and she said, oh ok and opened the front door. The female turned out to be Ms. Latwanya Shawntel Oliver, who was wanted on 2 felony counts of obtaining property by false pretense. Prior to going to the residence, I asked dispatch to verify the felony warrants and they advised same were active. I told Ms. Oliver she had felony warrants and she stated, Lawd, what have I done-I aint done nothing wrong. I stated, you are under arrest and will find out further at the magistrates office. Ms. Oliver stated, I haven't done nothing-can I call my daughter and let her know. I told her she can make a phone call at the station. She said, well, ok, let me get my keys, turn off my lights, lock up my house and stuff. Can I do that? Because you are just ugh. I replied, yes, you can do that. Ms. Oliver turned off some of her lights and walked out of the front door and I asked, aren't you going to lock up and she turned around and said, I forgot, let me get my keys of the dresser and she said we are going to have to go out of the back door because something is wrong with the front door. When we walked out of the back door, she did not pull it all the way through and I pulled it for her and asked, do you have a deadbolt key and she said yes but something is wrong with it. As she was approaching my patrol vehicle, I told her to stop and submit to the handcuffs. She replied, why do you have to handcuff me? I told her it is for my safety as well as yours (standard procedure). I was able to get one handcuff on her and she became irate and would not comply with my lawful orders. She screamed to the top of her lungs help, help, help me-your not taking me anywhere until' I see some papers-I'm not going anywhere. I told her to calm down and that she was making the situation worst. I told her cooperation goes along way with law enforcement when you go before the magistrate or judge. Ms. Oliver stated, ok, sir, I apologize. I went to handcuff the second arm and she went crazy, she lost it. She pulled away from me while saying no, no, I'm not going, leave me alone. I placed her up against my car, opened the rear passenger door instructed her to get in and she became extremely combative by yelling no, I'm not going no where, help, help. She pushed her body against mines and striked me in the lower leg twice. I performed a takedown maneuver, which is an approved subject control technique. To prevent additional manipulation of the handcuffs, I tightened them while on the ground. Ms. Oliver stated, you broke my arms, oooowwwwww, oooowwwwww my arms are killing me, they are hurting sir, I think my arms are sprained, I'm in so much pain. I immediately radioed for EMS 10-18 due to injuries sustained from a use of force (2024 hours). Prior to, I called for back up at 2022 hours. Sgt. Welborn arrived on scene first as back up and I told him, she has felony warrants, refused to comply, pulled away and assaulted me. EMS arrived and stated, her arm is not broke because she can move her shoulders. Ms. Oliver continued to scream in pain and the EMS Supervisor re-examined her arm and said, yep, it is broken. Ms. Oliver was transported to Maria Parham Hospital in Henderson, NC for further medical treatment. I acted in good faith to arrest Ms. Oliver and when she refused I took action as authorized. I used reasonable force to achieve the law enforcement objective and to gain compliance and to ensure public safety. I afforded her every opportunity to comply with my lawful orders and she refused. I do not have a taser and pepper spray would have been ineffective as she was moving uncontrollably and had glasses on, which would have caused same to ricochet (more likely than not). Officer presence and verbalization did not work. Thus, I had to go hands on. I made a good faith effort to maintain and restore order. I followed the objective reasonableness standard under the 4th Amendment to arrest the defendant and to seize her person due to the outstanding felony warrants notwithstanding other violation of law (assault on a law enforcement officer and resisting arrest). It should be noted, Ms. Oliver has a record of communicating</p>			
Officer Name / ID DEPUTY J. J. WHITE - 259		Officer Signature 	Date / Time Submitted 10-23-18 / 0000 hrs

DCI-602 F

Page 3
of 5

REV 3/92



CONTINUATION PAGE

1. AGENCY VANCE COUNTY SHERIFF'S OFFICE	2. ORI NC0910000	3. CONTINUATION TO: <input checked="" type="checkbox"/> INVESTIGATION <input type="checkbox"/> ARREST <input type="checkbox"/> SUPPLEMENTARY INV.	4. OCA FILE NO. 18013870
Narrative threats, simple assault and assault with a deadly weapon (aggravating factors on her part and mitigating factors for me). Ms. Oliver filed a verbal frivolous complaint against me for pulling her over and harrasing her at the Shell Gas Station on Warrenton Road. I did not pull her over, I never turned on my lights and sirens. I noticed a car traveling at a high rate of speed on North Garnett Street passing Parker and Bickett Streets, Old Norlina Road and Spring Valley Drive. On 10-21-2018, 2130 hours approximately, I was patrolling Old Norlina Road going towards Main Street (the intersection of Garnett, Beckford, Main, Chestnut). The vehicle was clearly exceeding safe speed. I brought my vehicle up to 60 mph and had trouble keeping up with her in a 35 MPH Zone. It was not until' she almost rear-ended a dark in color truck at the Handy Mart beside Forsyth Skippers that she slowed down but picked the speed right back up. It should be noted, she has a horrible DMV record, 15 speeding tickets, various running a red light/stop signs and several accidents. Had I known this at the time, I would have pulled her and took appropriate action. I ran the tag, which came back active and valid. I asked dispatch to run the registered owner for warrants, which came back negative. Ms. Oliver pulled into the Shell Gas Station and I pulled around to the Carey Chapel Road entrance for the station and saw her exit the vehicle (FFS-2692) and told her to slow it down and to watch her speed. I was trying to have open dialogue with her (community oriented policing) and she started screaming and yelling for no reason, I know my rights, you should have pulled me back there and wrote the ticket, I know my rights. I advised her it was not to late to write the ticket but I'm trying to talk to you about not speeding in the future. She said, well, write the ticket then and you have a good day. Due to dispatch failing to properly do a warrant check (public safety issue), I was unaware she had felony warrants. It is unfortunate that injuries occurred, however, I have a job to do and the general welfare of the public is first and violators must be apprehended pursuant to standard operating procedures, general statue, common law and judicial precedent (state and federal case law). See Use of Force Report. This is an account of what happened and I reserve the right to amend this statement (addendum) as the situation happened so quickly.			
SUPPLEMENT #3 SGT. C. M. WELBORN - 170 10/23/2018 04:37			
ON 10-22-2018, I RESPONDED TO 52 DAISY LANE REFERENCE DEPUTY WHITE CALLING FOR ASSISTANCE. WHILE ENROUTE DEPUTY WHITE CALLED FOR EMS EMERGENCY TRAFFIC REFERENCE TO USE OF FORCE AND EMS WOULD BE TOLD MORE ONCE ON SCENE. WHEN I ARRIVED ON SCENE VANCE COUNTY EMS WAS ALREADY ON SCENE. WHEN I ARRIVED I NOTICE A BLACK FEMALE LAYING ON THE GROUND HANDCUFFED AND SHE WAS IDENTIFIED AS LATWANYA OLIVER. SHE WAS HOLLERING STATING HER ARM WAS BROKE. I ASKED DEPUTY WHITE WHAT HAPPENED AND HE STATED HE ATTEMPTED TO SERVE MRS. OLIVER WITH FELONY WARRANTS. DEPUTY WHITE STATED MRS. OLIVER STARTED RESISTING AND BECAME COMBATIVE KICKING HIM TWICE. DEPUTY WHITE STATED HE TOOK HER TO THE GROUND AND HANDCUFFED HER. DEPUTY WHITE STATED HE CALLED FOR ASSISTANCE AND EMS. VANCE COUNTY EMS FIRST STATED MRS. OLIVER ARM WAS NOT BROKEN THEN CHIEF OVERTON STATED HER ARM WAS BROKEN. MRS. OLIVER WAS TRANSPORTED TO MARIA PARHAM MEDICAL CENTER FOR FURTHER TREATMENT. WHEN I ARRIVED AT THE HOSPITAL I SPOKE WITH MRS. OLIVER. SHE STATED THAT DEPUTY WHITE WAS HARASSING HER. SHE STATED DEPUTY WHITE FOLLOWED HER ON SUNDAY FROM JOHN FOSTER HOMES UNTIL SHE PULLED INTO S&N FOOD MART ABOUT EIGHT OR NINE OCLOCK ON 10-21-2018. MRS. OLIVER STATED DEPUTY WHITE UP TO HER IN THE PARKING LOT TELLING HER ABOUT HER SPEEDING. SHE STATED WRITE ME A TICKET BECAUSE I KNOW MY RIGHTS. MRS.			
Officer Name / ID DEPUTY J. J. WHITE - 259	Officer Signature 	Date / Time Submitted 10-23-18 / 0400hrs	Page 4 of 5

DCI-602 F

REV. 3/92

REV 3/92

W Bullock – Ogletree Letter

Ogletree Deakins

Andrew C. Avram
Direct: 919-789-3217
E-mail: Andrew.Avram@ogletree.com

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

Attorneys at Law

4208 Six Forks Road, Suite 1100
Raleigh, NC 27609
Telephone: 919.787.9700
Facsimile: AuthorFaxNo
www.ogletree.com

November 9, 2018

Mr. Alvan Robinson
Investigator – U.S. EEOC
Suite 700, 434 Fayetteville Street
Raleigh, NC 27601-1701

RE: Charging Party: Justin J. White
EEOC Charge No.: 433-2018-03289
Respondent: Vance County Sheriff's Office

Dear Mr. Robinson:

We represent the Vance County Sheriff's Office ("Vance County") in the referenced matter. Please accept this letter as Vance County's confidential response to the allegations raised by Charging Party Justin White ("Charging Party" or "White"). The information and materials provided herein are confidential and should not be disclosed by your office.¹

Introduction

Vance County is an equal opportunity employer and prohibits discrimination. A copy of the relevant pages from Vance County's Personnel Policy Manual are attached as Exhibit 1. White was aware of these policies. A copy of his signed acknowledgment of receipt of the Vance County Personnel Manual is attached as Exhibit 2.

White alleges that during his employment with Vance County, he was discriminated against based on his race, gender, and in retaliation for engaging in protected activity. He also alleges that this discrimination occurred in the following areas: (1) Discipline; (2) Corrective Action; (3) Treatment; (4) Disrespect; (5) Issuance of Safety Equipment; (6) Subordinate Status; and (7) Retaliation.

All of White's claims are without merit and should be dismissed. White provides no factual allegations in support of his claims. White does not provide details as to how he was allegedly treated differently than similarly situated individuals outside of his protected class, nor does White

¹ The information herein is not everything Vance County knows about Mr. White. This response is intended to succinctly address the concerns expressed in the Charge of Discrimination and to expose the falsity of Mr. White's claim.

provide details regarding his retaliation allegation. The lack of specificity in White's charge make it impossible for Vance County to respond fully to all of these allegations.

In actuality, Vance County disciplined White for repeated rule violations and ultimately terminated White for using excessive force against a female. White received safety equipment consistent with Vance County's normal practices, and at no point did Vance County retaliate against White for engaging in any sort of protected activity or discriminate against him in any fashion. Accordingly, White's claims should be dismissed.

Background

Vance County Sheriff's Office provides individual and property protection to the citizens of Vance County. The Sheriff's Office is comprised of the following divisions: (1) Administrative Division; (2) Patrol Division; (3) Narcotics/Vice Division; (4) Criminal Investigations Unit; (5) K-9 Division; (6) Court Division; and (7) Civil Division.

The Patrol Division serves 45,000 residents covering approximately 269 miles and is organized into four squads: A, B, C, and D which collectively provide 24-hour coverage for Vance County seven days a week. Officers assigned to A and B squad work together and officers assigned C and D squad work together. A/B rotates with C/D every four days, therefore each officer in the Patrol Division works for four days and then has four days off. Each squad consist of 2 or 3 Deputies and a Sergeant. Lieutenant Goolsby and Lieutenant Campbell supervise the Patrol Division.

The issues in this matter arise primarily from Charging Party's continued practice of pulling over Vance County citizens for minor traffic violations and subsequently issuing criminal summonses despite this being outside of his job responsibilities.

Vance County hired White on June 5, 2017 as a Deputy in A squad. His primary job responsibilities were to check on businesses, serve arrest warrants, answer 911 calls, and focus on public safety. Upon hire, White completed the first two weeks of field training with Lieutenant Campbell and then finished his field training with Deputy Wayne. During field training, Campbell noticed that White was overly concerned with traffic violations, despite this not being the primary job function of a Sheriff's Deputy. During training, Lt. Campbell emphasized to White several times that minor traffic stops were not the primary focus of the job position. Deputy Wayne also noted during field training that White was very interested in traffic and reiterated to him that Deputies were not supposed to stop cars and perform traffic unless absolutely necessary.

After White completed field training, he was not issued a citation book. This was not uncommon for Deputies in the department. In fact, several other new Deputies were not issued citation books. Vance County did not issue citation books to newer Deputies because their main focus was to respond to 911 calls and to serve warrants and other legal papers.

Even though White did not have a traffic book, he started pulling over Vance County citizens for minor traffic violations. White did not have the power to write traffic citations, so he would either call another officer for backup to write the citation for him, or he would pull over the citizen, let

Mr. Alvan Robinson
November 9, 2018
Page 5

Ogletree
Deakins

Sincerely,



Andrew C. Avram

ACA:bds
Enclosures

36293235.1

W Bullock – Order re K9 Dave

VANCE COUNTY SHERIFF'S OFFICE
EMPLOYEE COUNSELING RECORD

DATE: 08/20/2018

TIME: 17:00 PM

EMPLOYEE: DEPUTY ADAM HIGHT

Due to the circumstances of the K-9 incident involving K-9 Dave today at the school nutrition warehouse, you are hereby instructed that going forward until further training can be conducted and K-9 Dave satisfactorily certified, you are not to bring K-9 Dave to work. K-9 Dave is to be kept at home secured in his kennel at all times unless you are exercising the dog. Any work conducted with K-9 Dave outside of the kennel shall be ON LEAD until further notice. At no time should K-9 Dave be outside his confines without physical control of the K-9 with actual leads. Per Sheriff White.


EMPLOYEE SIGNATURE

DATE


SUPERVISOR SIGNATURE

DATE

W Bullock – State v. Hargrove

Court of Appeals of North Carolina.

STATE of North Carolina v. Brian Lamont HARGROVE.

No. COA08-1538.

Decided: August 17, 2010

Attorney General Roy Cooper, by Assistant Attorney General Charles E. Reece, for the State. Jarvis John Edgerton, IV, for defendant-appellant.

Appeal by defendant from judgment entered 20 March 2008 and order entered 25 March 2008 by Judge Paul G. Gessner in Superior Court, Vance County. Heard in the Court of Appeals 18 August 2009.

“[A] defendant is not entitled by reason of former jeopardy to dismissal of the charge against him, where he failed to object to the trial court's termination of his first trial by a declaration of mistrial.”¹ In the present case, Defendant Brian Lamont Hargrove argues that the trial court erred in denying his motion to dismiss the charges against him on the grounds of double jeopardy, when his prior trial on the same charges ended with the declaration of a mistrial. Because Defendant failed to object to the declaration of a mistrial, Defendant failed to preserve his claim. We therefore dismiss Defendant's appeal.

On 25 July 2005 Defendant was indicted for robbery with a dangerous weapon and first degree murder. Defendant filed a motion to declare the case noncapital on 20 June 2006. On 25 July 2006, the Vance County District Attorney filed a motion consenting to declare the case noncapital. Defendant was first tried in February 2008. The State's evidence in that case tended to show the following:

Samir Harith Abdul Rasheed was found dead in his home on 29 March 2004. At the time his body was discovered, Rasheed was renting a mobile home on or near Vincent Hoyle Road. It was determined that Rasheed's death was caused by two gunshot wounds, one to the left cheek and one to the abdomen. At the scene, officers found several .357 SIG shell casings.

The State presented the testimony of Weldon Bullock, a captain with the Vance County Sheriff's Office. After discussing some of the ballistics evidence recovered from Rasheed's home, Bullock was asked to identify three other exhibits. These were three .357 SIG shell casings found beside a dirt path near Club Pond Road on 21 June 2005. Bullock testified that all of these items were obtained from Officer Cordell.

The State later called J.M. Cordell. Cordell testified that in 2004 and 2005 he was employed as Chief Investigator with the Vance County Sheriff's Department. Cordell stated that the first time he went to Club Pond Road he was responding to a call from Detective Allman, who reported that he had observed a box of .357 SIG bullets on top of a refrigerator in a residence on Club Pond Road. Cordell went to the vicinity and found three spent .357 SIG casings on a dirt path that runs off the end of Club Pond Road. Cordell stated that Defendant was living in a nearby house at the time.

On cross-examination, Cordell stated that the investigative report on the shell casings found on Club Pond Road was part of the Sheriff's Department file in this case. Defense counsel told the trial court that the report and the photographs of the shell casings found on Club Pond Road had not been turned over by the State in discovery. The trial court instructed the prosecutor to produce the report, and declared a recess.

When court reconvened, the prosecutor informed the trial court that he was unable to locate any additional report or photographs. The judge informed the attorneys that he would see them in chambers. During the conference, the judge asked whether the State or Defendant was going to request a mistrial. Neither attorney moved for a mistrial at that time. Court reconvened and Defense counsel asked for another recess to research what to do at this point. The prosecutor stated that he had no objection to a recess, and asked to approach.

In the ensuing bench conference, the trial court informed Defense counsel that if he did not request a mistrial, then he would be engaging in per se ineffective assistance of counsel. The judge informed the prosecutor that he was unsure what effect a motion for a mistrial by the State would have on the case. Nevertheless, Defense counsel did not move for a mistrial.

On the record, but outside of the presence of the jury, the trial court explained that he could not allow the jury to consider evidence which had not been provided to Defendant, and he could not expect the jury to disregard "the connection between the discovery of the unique bullets on the refrigerator and the bullets that were allegedly used in the murder[.]" The judge then stated "the Court, of its own motion . would declare a mistrial in this case."

The jury was brought into the courtroom. The trial court explained that the law requires full disclosure by the State, and under these circumstances the judge would have to ask the jury to disregard Cordell's testimony. The trial court stated "I can't put you in that position, because it-it would be extremely difficult for anyone to remain fair and impartial, having heard some testimony which I consider to be critical in the case, and having to disregard that evidence with respect to the trial of the case." The trial court stated that it had therefore declared a mistrial. The trial court then dismissed the jury.

The State gave notice to Defendant that it intended to try him again on the same charges. On 6 March 2008 Defendant filed a motion to dismiss on the grounds of double jeopardy. A hearing on the motion was conducted on 13 March 2008. The judge reserved ruling on the motion. Defendant was tried at the 17 March 2008 Criminal Session of Vance County Superior Court. At trial, the State presented the testimony of, among others, Rashad Coleman, a witness to Defendant's shooting the victim. A jury found Defendant guilty of robbery with a dangerous weapon and second degree murder. On 25 March 2008 the trial court entered a written order denying Defendant's motion to dismiss.

On appeal, Defendant argues that the trial court violated his constitutional right to be free from double jeopardy. Defendant first argues that the trial court erred in declaring a mistrial in the absence of manifest necessity, thereby subjecting him to double jeopardy. Defendant argues further that the motion hearing court erred in failing to review the trial court's conclusion that it was impossible to proceed with the first trial in conformity with law.

Preliminarily we address the question of whether Defendant preserved the issue he now seeks to appeal. Our Supreme Court “held in *State v. Odom*, 316 N.C. 306, 341 S.E.2d 332 (1986), a noncapital case, that a defendant is not entitled by reason of former jeopardy to dismissal of the charge against him, where he failed to object to the trial court's termination of his first trial by a declaration of mistrial.” *State v. Lachat*, 317 N.C. 73, 85, 343 S.E.2d 872, 878 (1986). Our Supreme Court indicated in *Lachat* that a different rule would apply in capital cases, when the trial court provided the defendant no opportunity to object by prior notice or warning. *Id.* at 85-86, 343 S.E.2d at 878-79.

Here, pursuant to the prosecutor's consent to Defendant's pre-trial motion to declare the case noncapital, Defendant's trial was a noncapital case. See *id.* at 86, 343 S.E.2d at 879. (noting that the State's stipulation caused case to lose its capital nature); see also N.C. Gen.Stat. § 15A-2004(a) (2009) (“The State, in its discretion, may elect to try a defendant capitally or noncapitally for first degree murder[.]”). Defendant is therefore not entitled to the *Lachat* exception to the *Odom* waiver rule when the case is capital.

Defendant posits that *Lachat* provides an alternative avenue to the exception when a defendant does not have the opportunity to object to the declaration of a mistrial. Contrary to Defendant's assertion, however, Defendant clearly had the opportunity to object in this case. The trial court first raised the issue of a mistrial in chambers with the attorneys, and again at the bench-conference. Defense counsel was thereby notified that the trial court was considering a mistrial. The trial court then explained its decision to the attorneys on the record before the jury entered the courtroom and was informed of the mistrial. At no point during the conferences with the judge, during the trial court's announcement to the attorneys, or during the trial court's explanation to the jury did Defendant object to the mistrial. Nor did Defendant request an opportunity to be heard on the matter. By failing to object when his first noncapital trial was terminated, Defendant failed to preserve his claim that he is entitled by reason of former jeopardy to dismissal of the charges against him. See *Odom*, 316 N.C. at 311, 341 S.E.2d at 335.

APPEAL DISMISSED.

FOOTNOTES

1. *State v. Lachat*, 317 N.C. 73, 85, 343 S. E.2d 872, 878 (1986).

W Bullock – Termination Action



**VANCE COUNTY
PERSONNEL / PAYROLL ACTION FORM**



☐ New Hire/Rehire
 ☐ Change
 ☐ Leave of Absence
☒ Termination
☐ Other

Effective Date: 10/24/2018 Date of Hire: 06/05/2017
 Name: JUSTIN J. WHITE SSN: _____
 Address: _____ Marital Status: _____
 City/State: _____ Sex: _____ Race: _____
 Zip/County: _____ Date of Birth: _____
 Department: SHERIFF'S OFFICE
 Job Title: _____ Grade: _____ Job #: _____
 Monthly/Hourly Rate: _____ Annual Salary: _____
 Explanation: SERVICES NO LONGER NEEDED

SHERIFF & 911 ONLY: Please check all that apply. Provide a date and a copy of the certification.

☐ Sheriff Department-OLET Certified: _____
☐ 911-EMD Certified: _____

Employee Signature: "Not Available for Signature" Date: _____
 Department Head Signature: [Signature] Date: 10-25-18
 Human Resources Signature: [Signature] Date: 10/25/2018
 Payroll Signature: _____ Date: _____

This instrument has been pre-audited in the manner required by the Local Government Budget & Fiscal Control Act.
 Approved by Finance Director: _____ Date: _____

HUMAN RESOURCES USE ONLY			
Please check all that apply and attach the appropriate forms.			
Deductions:	<input type="checkbox"/> Employee - Medical	<input type="checkbox"/> Employee - Dental	<input type="checkbox"/> Employee - Life
Attach the following Forms:	<input type="checkbox"/> Federal & State Tax Forms	<input type="checkbox"/> Direct Deposit Info	<input type="checkbox"/> Longevity
Upon Employment Separation - Eligible:	<input type="checkbox"/> Vacation Payout	<input type="checkbox"/> Comp Time Payout	
Retirees Eligible for Benefits:	<input type="checkbox"/> Health	<input type="checkbox"/> Dental	<input type="checkbox"/> Life
Completed By: _____	Date: _____		

Form Revised 7/18/18

EXHIBIT 5

W Bullock – Vance County Personnel Policy

VANCE COUNTY

PERSONNEL POLICY MANUAL



Revised July 1, 2016
January 1, 2009

VANCE COUNTY PERSONNEL POLICY

BE IT RESOLVED by the Board of County Commissioners for Vance County that the following policies apply to the appointment, classification, benefits, salary, promotion, demotion, dismissal, and conditions of employment for the employees of the County.

<u>Article</u>	<u>Title</u>	<u>Page</u>
ARTICLE I.	GENERAL PROVISIONS	
Section 1.	Purpose of the Policy.....	5
Section 2.	Merit Principles	5
Section 3.	Responsibilities of the County Board of Commissioners	5
Section 4.	Responsibilities of the County Manager	5
Section 5.	Responsibilities of the Human Resources Director	6
Section 6.	Application of Policies, Plan, Rules, and Regulations	7
Section 7.	Departmental Rules and Regulations	7
Section 8.	Definitions	7
Section 9.	At Will Employment	8
ARTICLE II.	POSITION CLASSIFICATION PLAN	9
Section 1.	Purpose	9
Section 2.	Composition of the Position Classification Plan	9
Section 3.	Use of the Position Classification Plan	9
Section 4.	Administration of the Position Classification Plan	9
Section 5.	Authorization of New Positions and the Position Classification Plan.....	10
Section 6.	Request for Reclassification	10
ARTICLE III.	THE PAY PLAN	
Section 1.	Definition	11
Section 2.	Administration and Maintenance	11
Section 3.	Starting Salaries	11
Section 4.	Trainee Designation and Provisions	11
Section 5.	Probationary Pay Increases	12
Section 6.	Pay Range Increases	12
Section 7.	Performance Pay Increases	12
Section 8.	Salary Effect of Promotions, Demotions, Transfers, And Reclassifications	13
Section 9.	Salary Effect of Salary Range Revisions	13
Section 10.	Transition to a New Salary Plan	14
Section 11.	Effective Date of Salary Changes	14
Section 12.	Overtime Pay Provisions	14
Section 13.	On-Call and Call-Back Compensation	15
Section 14.	Payroll Schedule and Deductions	16
Section 15.	Hourly Rate of Pay	16
Section 16.	Longevity Pay	17
Section 17.	Pay for Interim Assignment in a Higher Level Classification ...	17

ARTICLE IV. RECRUITMENT AND EMPLOYMENT	18
Section 1. Equal Employment Opportunity	18
Section 2. Implementation of Equal Employment Opportunity Policy	18
Section 3. Recruitment, Selection and Appointment	18
Section 4. Probationary Period	19
Section 5. Promotion	19
Section 6. Demotion	20
Section 7. Transfer	20
ARTICLE V. CONDITIONS OF EMPLOYMENT	21
Section 1. Work Schedule	21
Section 2. Political Activity	21
Section 3. Expectation of Ethical Conduct	21
Section 4. Outside Employment	22
Section 5. Dual Employment	22
Section 6. Employment of Relatives	22
Section 7. Workplace Romance	23
Section 8. Harassment	23
Section 9. Use of County Time, Equipment, Supplies, and Vehicles	24
Section 10. Performance Evaluation	24
Section 11. Safety	24
Section 12. Immigration Law Requirements	24
Section 13. Substance Abuse	25
Section 14. Credentials and Certifications	25
ARTICLE VI. EMPLOYEE BENEFITS	26
Section 1. Eligibility	26
Section 2. Group Health and Hospitalization Insurance	26
Section 3. Group Life Insurance	26
Section 4. Other Optional Group Insurance Plans	26
Section 5. Retirement	26
Section 6. Supplemental Retirement Benefits (401-K)	27
Section 7. Social Security	27
Section 8. Workers' Compensation	27
Section 9. Unemployment Compensation	28
Section 10. Tuition Assistance Program	28
Section 11. Credit Union	28
Section 12. Law Enforcement Separation Allowance	28
ARTICLE VII. HOLIDAYS AND LEAVES OF ABSENCE	30
Section 1. Policy	30
Section 2. Holidays	30
Section 3. Holidays: Effect of Other Types of Leave	30
Section 4. Holidays: Compensation When Work is Required	30
Section 5. Vacation Leave	30
Section 6. Vacation Leave: Use by Probationary Employees	31
Section 7. Vacation Leave: Accrual Rate	31
Section 8. Vacation Leave: Maximum Accumulation	31
Section 9. Vacation Leave: Manner of Taking	31
Section 10. Vacation Leave: Payment Upon Separation	31

Section 11.	Vacation Leave: Payment Upon Death	32
Section 12.	Sick Leave	32
Section 13.	Sick Leave: Accrual Rate and Accumulation	32
Section 14.	Sick Leave: Medical Certification	32
Section 15.	Leave Pro-Rated	33
Section 16.	Leave Without Pay	33
Section 17.	Family Medical Leave	33
Section 18.	Family Medical Leave: Medical Certification	34
Section 19.	Family Medical Leave and Leave Without Pay: Retention and Continuation of Benefits	35
Section 20.	Workers' Compensation Leave	35
Section 21.	Military Leave	36
Section 22.	Reinstatement Following Military Service	36
Section 23.	Civil Leave	37
Section 24.	Parental School Leave	37
Section 25.	Funeral Leave	37
Section 26.	Adverse Weather and Emergency Conditions Policy	37
ARTICLE VIII. SEPARATION AND REINSTATEMENT		39
Section 1.	Types of Separations	39
Section 2.	Resignation	39
Section 3.	Reduction in Force	39
Section 4.	Disability	39
Section 5.	Voluntary Retirement	39
Section 6.	Death	40
Section 7.	Dismissal	40
Section 8.	Reinstatement	40
Section 9.	Rehiring	40
ARTICLE IX. UNSATISFACTORY JOB PERFORMANCE AND DETRIMENTAL PERSONAL CONDUCT		41
Section 1.	Disciplinary Action for Unsatisfactory Job Performance	41
Section 2.	Unsatisfactory Job Performance Defined	41
Section 3.	Communication and Warning Procedures Preceding Disciplinary Action for Unsatisfactory Job Performance	41
Section 4.	Disciplinary Action for Detrimental Personal Conduct	42
Section 5.	Detrimental Personal Conduct Defined	42
Section 6.	Pre-Dismissal Conference	43
Section 7.	Non-Disciplinary Suspension	43
ARTICLE X. GRIEVANCE PROCEDURE AND ADVERSE ACTION APPEAL ...		44
Section 1.	Policy	44
Section 2.	Grievance Defined	44
Section 3.	Purposes of the Grievance Procedure	44
Section 4.	Procedure	44
Section 5.	Role of the Human Resources Director	46
Section 6.	Grievance and Adverse Action Appeal Procedure for Discrimination	46

ARTICLE XI. PERSONNEL RECORDS AND REPORTS	47
Section 1. Public Information	47
Section 2. Access to Confidential Records	47
Section 3. Personnel Actions	48
Section 4. Records of Former Employees	48
Section 5. Remedies of Employees Objecting to Material in File	48
Section 6. Penalties for Permitting Access to Confidential Records	48
Section 7. Examining and/or Copying Confidential Material without	48
Section 8. Destruction of Records Regulated	48
ARTICLE XII. IMPLEMENTATION OF POLICIES	49
Section 1. Conflicting Policies Repealed	49
Section 2. Separability	49
Section 3. Effective Date	49
Section 4. Amendments	49
GLOSSARY	50

ARTICLE I. GENERAL PROVISIONS

Section 1. Purpose of the Policy

It is the purpose of this policy and the rules and regulations set forth to establish a fair and uniform system of personnel management for all employees of the County under the administration of the County Manager, Sheriff, Register of Deeds, Elections Board, and Social Services Board. These aforementioned entities are the official appointing authorities covered by this personnel policy. The Sheriff and Register of Deeds are covered by this personnel policy as employees; however, County Commissioners are not covered by this policy. State requirements will supersede these policies for positions subject to the State Personnel Act whenever there is a conflict. This policy is established under authority of G.S. 153A, Article 5 and G.S. 126 of the General Statutes of North Carolina.

Section 2. Merit Principles

All appointments and personnel actions shall be made on the basis of merit. All positions requiring the performance of the same duties and fulfillment of the same responsibilities shall be assigned to the same class and salary grade. No applicant for County employment or employee shall be deprived of employment opportunities or otherwise be adversely affected as an employee because of an individual's race, color, religion, sex, national origin, political affiliation, qualified disability, or age.

Section 3. Responsibilities of the County Board of Commissioners

The County Board of Commissioners shall be responsible for establishing and approving human resources policies, the position classification and pay plan, and it may change the policies and benefits as necessary. The Board also shall make and confirm appointments when so specified by the general statutes.

Section 4. Responsibilities of the County Manager

The County Manager shall be responsible to the County Board of Commissioners for the administration and technical direction of the human resources program. The County Manager shall appoint, suspend, and remove County officers and employees except those elected by the people or whose appointment is otherwise provided for by law. The County Manager shall make appointments, dismissals and suspensions in accordance with the state statutes and other policies and procedures spelled out in other Articles in this Policy.

The County Manager shall:

- a) recommend rules and revisions to the personnel system to the County Board of Commissioners for consideration;
- b) make changes as necessary to maintain an up to date and accurate position classification plan;
- c) recommend necessary revisions to the pay plan;
- d) determine which employees shall be subject to the overtime provisions of the Fair Labor Standards Act (FLSA);

- e) develop and administer such recruiting programs as may be necessary to obtain an adequate supply of competent applicants to meet the needs of the County;
- f) perform such other duties as may be assigned by the County Board of Commissioners not inconsistent with this Policy; and
- g) appoint an employee to the role of Human Resources Director or serve in that role for the County.

Section 5. Responsibilities of the Human Resources Director

The responsibilities of the Human Resources Director are to make recommendations to the County Manager on the following:

- a) recommend rules and revisions to the personnel system to the County Manager for consideration;
- b) recommend changes as necessary to maintain an up to date and accurate position classification plan;
- c) recommend necessary revisions to the pay plan;
- d) recommend which employees shall be subject to the overtime provisions of FLSA;
- e) maintain a roster of all persons in the County service;
- f) establish and maintain a list of authorized positions in the County service at the beginning of each budget year which identifies each authorized position, class title of position, salary range, any changes in class title and status, position number and other such data as may be desirable or useful;
- g) develop and administer such recruiting programs as may be necessary to obtain an adequate supply of competent applicants to meet the needs of the County;
- h) develop and coordinate training and educational programs for County employees;
- i) investigate periodically the operation and effect of the personnel provisions of this policy;
- j) perform such other duties as may be assigned by the County Manager not inconsistent with this Policy; and
- k) insure that all employees receive and sign for a copy of the personnel policy and any revisions.

In the event there is no Human Resources Office, these duties will be assumed by the County Manager or his/her designee.

Section 6. Application of Policies, Plan, Rules, and Regulations

This personnel policy and all rules and regulations adopted pursuant thereto shall be binding on all County employees. The County Manager, County Attorney, elected officials, appointed members of the County Board and advisory boards and commissions will be exempted except in sections where specifically included. An employee violating any of the provisions of this policy shall be subject to appropriate disciplinary action, as well as prosecution under any civil or criminal laws which have been violated.

Section 7. Departmental Rules and Regulations

Due to the particular personnel and operational requirements of the various departments of the County, each department is authorized to establish supplemental rules and regulations applicable only to the personnel of that department. All such rules and regulations shall be subject to the approval of the County Manager or designee, and shall not in any way conflict with the provisions of this Policy, but shall be considered as a supplement to this Chapter.

Section 8. Definitions

For the purposes of this chapter, the following words and phrases shall have the meanings respectively ascribed to them by this section:

Adverse Action. An involuntary demotion, reduction in pay, suspension, reduction in force, or separation from employment.

Anniversary Date. The employee's most recent date of employment with the county service in a permanent position.

Hiring Authority. The County Manager will be designated as the Hiring Authority with the following exceptions:

- a) The Sheriff shall be the Hiring Authority for positions in the Sheriff's Office and at the Detention Center;
- b) The Register of Deeds shall be the Hiring Authority for positions in the Register of Deeds Office;
- c) The Board of Elections shall be the Hiring Authority for positions in the Elections Department; and
- d) The Social Services Director shall be the Hiring Authority for positions in the Social Services Department.

Classification. A title of a single or group of positions which are sufficiently similar to require the same set of knowledges, skills, abilities, education and experience qualifications.

Full-time employee. An employee who is in a position for which an average work week of at least 37.5 hours and continuous employment of at least 12 months are required by the County. Such employees are eligible for benefits.

Immediate family. A spouse, parent, guardian, child, sister, brother, grandparent, grandchild and/or the various combinations of half, step, in-law, and adopted relationships that can be derived from those named.

Impaired. Being in a less than perfect or whole condition. Such state that one's physical and/or mental capacities and capabilities are weakened, diminished, or damaged.

Part-time employee. An employee who is in a position for which an average work week consists of less than 37.5 hours and continuous employment of at least 12 months. There are two categories of part-time employees: Employees in a budgeted, salaried position. Such positions are eligible for leave benefits. Employees whose positions are not budgeted and paid on a hourly basis, are referred to as hourly paid employees and are not eligible to earn leave benefits.

Permanent position. A position authorized for the budget year for a full twelve months and budgeted for twenty or more hours per week. All County positions are subject to budget review and approval each year by the Board of Commissioners and all employees' work and conduct must meet County standards. Therefore, reference to "permanent" positions or employment should not be construed as a contract or right to perpetual funding or employment.

Probationary employee. An employee appointed to a full or part-time regular position who has not yet successfully completed the designated probationary period. Persons in trainee appointments are a probationary employee for the full duration of their appointment in that status.

Public safety employee. An employee who works in the following departments: Animal Control, Emergency Management & Operations, Sheriff Department, Detention Center, Fire, and Emergency Medical Services.

Regular employee. An employee appointed to a full or part-time position who has successfully completed the designated probationary period.

Trainee. An employee status when an applicant is hired (or employee promoted) who does not meet all of the requirements for the position. During the duration of a trainee appointment, the employee is on probationary status.

Work Against Appointment. In departments whose employees are subject to the State Personnel Act, the Hiring Authority may appoint an employee in a work against situation. When qualified applicants are unavailable and there is no trainee provision for the classification of the vacancy, the Hiring Authority may appoint an employee below the level of the regular classification in a "work against" appointment. This appointment is for the purpose of allowing the employee to gain the qualifications needed for the full class through on the job experience. A work against appointment may not be made when applicants are available who meet the knowledge, skills, abilities, training and experience requirements for the full class in the position being recruited without clear justification.

Section 9. At Will Employment

Vance County is an at will employer. Nothing in this policy creates an employment contract or term between the County and its employees. Employees subject to the State Personnel Act will be governed by those provisions where they apply.

ARTICLE II. POSITION CLASSIFICATION PLAN

Section 1. Purpose.

The position classification plan provides a complete inventory of all authorized and permanent positions in the County service, and an accurate description and specification for each class of employment. The plan standardizes job titles, each of which is indicative of a definite range of duties and responsibilities. All positions covered by the personnel policy are to be classified according to the assigned duties, responsibilities, qualifications needed, and other required factors. In order to insure its continuing value as a personnel management tool, the positions classification plan will be maintained to reflect the current work assignments and other conditions and requirements which are factors in proper classification and allocation of regular positions.

Positions in the Department of Social Services will be classified by the NC Office of State Human Resources in compliance with the rules and regulations under the State Personnel Act.

Section 2. Composition of the Position Classification Plan

The classification plan shall consist of:

- a) A grouping of positions in classes which are approximately equal in difficulty and responsibility which call for the same general qualifications, and which can be equitably compensated within the same range of pay under similar working conditions;
- b) class titles descriptive of the work of the class;
- c) written specifications for each class of positions; and
- d) an allocation list showing the class title of each position in the classified service.

Section 3. Use of the Position Classification Plan

The classification plan is to be used:

- a) as a guide in recruiting and examining applicants for employment;
- b) in determining lines of promotion and in developing employee training programs;
- c) in determining salary to be paid for various types of work;
- d) in determining personnel service items in departmental budgets; and
- e) in providing uniform job terminology.

Section 4. Administration of the Position Classification Plan

The County Manager, assisted by the Human Resources Director, shall allocate each position covered by the classification plan to its appropriate class, and shall be responsible for the administration of the position classification plan. The Human Resources Director shall periodically review portions of the

classification plan and recommend revisions to the County Manager to ensure that classifications accurately reflect current job duties and responsibilities. The Human Resources Director shall also periodically review the entire classification plan and, when needed, recommend major changes to the County Manager. The Office of State Human Resources shall administer the classification plan for employees who are subject to the State Personnel Act.

Section 5. Authorization of New Positions and the Position Classification Plan

New positions shall be established upon recommendation of the Manager and approval of the Board of Commissioners. New positions shall be recommended to the Board of Commissioners with a recommended class title. The position classification plan, along with any new positions or classifications shall be approved by the Board of Commissioners and on file with the Human Resources Director. Copies will be available to all employees for review upon request.

Section 6. Request for Reclassification

Any employee who considers the position in which classified to be improper shall submit a request in writing for reclassification to such employee's immediate supervisor, who shall immediately transmit the request to the Human Resources Director through the chain of command. Upon receipt of such request, the Human Resources Director shall study the request, determine the merit of the reclassification, and make the necessary changes to maintain a fair and accurate classification plan, subject to approval by the County Manager.

ARTICLE III. THE PAY PLAN

Section 1. Definition

The pay plan includes the Salary Schedule and the Assignment of Classes to Salary Grades and Ranges adopted by the Board of County Commissioners. The salary schedule may consist of a Hiring, Minimum, Midpoint, and Maximum rates of pay for each job classification approved by the Board of County Commissioners. Salary increases within the pay range shall be based on criteria established by the County Manager and approved by the Board of County Commissioners.

Section 2. Administration and Maintenance

The County Manager shall be responsible for the administration and maintenance of the pay plan. All employees covered by the pay plan shall be paid at a rate within the salary range established for the respective position classification, except for employees in trainee status or employees whose existing salaries are above the established maximum rate following transition to a new pay plan.

The pay plan is intended to provide equitable compensation for all positions, reflecting differences in the duties and responsibilities, the comparable rates of pay for positions in public employment in the area, changes in the cost of living, the financial conditions of the County, and other factors. To this end, from time to time the County Manager, assisted by the Human Resources Director, shall make comparative studies of all factors affecting the level of salary ranges and may make minor adjustments in the allocation of positions to salary grades. When major adjustments encompassing numerous positions are needed, or when a general adjustment is needed to the pay plan, the County Manager shall recommend such changes in salary ranges as appear to be warranted to the Board. The Board shall adopt the Salary Schedule and assignment of Job Classes to Salary Grades, including any minor adjustments made by the County Manager during the previous budget year, annually as part of the budget process.

The County Manager may approve in-range adjustments to employee salaries not to exceed ten percent when necessary to accommodate inequities, special performance or achievements, or other issues.

Section 3. Starting Salaries

All persons employed in positions approved in the position classification plan normally shall be employed at the Hiring Rate for the classification in which they are employed; however, on the recommendation of the department head, with the approval of the County Manager, employee salaries may be approved above the Hiring Rate. Reasons for hiring above the Hiring Rate include exceptional education and experience qualifications of the applicant, a shortage of qualified applicants, and/or the refusal of qualified applicants to accept employment at the Hiring Rate. Department Heads shall consider internal equity of other employees in the department when making a recommendation for employment above the Hiring Rate.

Elected officials, i.e. the Sheriff and Register of Deeds, shall be paid upon initial election or appointment, at the entry rate of pay for the position because there is no Hiring Authority to make decisions concerning their qualifications for placement above the hiring rate.

Section 4. Trainee Designation and Provisions

Applicants being considered for employment or County employees who do not meet all of the requirements for the position for which they are being considered may be hired, promoted, demoted, or

transferred by the County Manager to a "trainee" status or under the State Personnel Act job classes as a "work against." In such cases, a plan for training and meeting the minimum qualifications for the job classification, including a time schedule, must be prepared by the supervisor. An employee shall remain at the trainee or "work against" salary level until the Department Head certifies that the employee is qualified to assume full responsibilities of the position and the County Manager approves the certifications. The Department Head shall review the progress of each employee in a trainee or "work against" status every six months or more frequently as necessary to determine when the employee is qualified to assume full responsibilities of the position. "Trainee" salaries may be one to three grades below the Hiring rate established for the position for which the person is being trained. Assignment three grades below is appropriate when the traineeship is expected to last two years. Assignment two grades below is appropriate for more than six months but less than two years. (Note: Positions subject to the State Personnel Act may be assigned no more than two grades below as for trainee purposes.) The actual assignment should be reviewed and approved by the Human Resources Director. A new employee designated as "trainee" appointment shall be in a probationary status until requirements for the full job class are met.

If the training is not successfully completed as planned, the employee shall be transferred, demoted, or dismissed. If the training is successfully completed, the employee shall be paid at least at the Hiring rate established for the job class.

Section 5. Probationary Pay Increases

Employees hired or promoted into the Hiring Rate of the pay range shall receive a salary increase within the salary range of approximately 5% upon successful completion of the probationary period. Employees serving a twelve-month probationary period are eligible for consideration for this pay increase after nine months of successful employment. Employees hired or promoted above the hiring rate shall receive an increase of up to 2.5% based upon performance and approval of the Human Resources Director for consistency across departmental lines when removed from probationary status. (See Article IV, Section 4 for more information on probationary periods). Such increases shall only be provided so long as the funding for such an increase is available.

Section 6. Pay Range Increases

Upward movement within the established salary range for an employee is not automatic but rather based upon specific criteria. Procedures for determining performance levels and performance pay increases shall be established in procedures approved by the County Manager.

Section 7. Performance Pay Bonus

If the County implements a performance pay system, employees who are at the maximum of the salary range for their position classification will be eligible to be considered for a one-time performance (merit) bonus at their regular performance evaluation time. A Performance (merit) bonus shall be awarded based upon the performance of the employee as described in the performance evaluation and shall be the same percentage of annual salary as employees within the salary range with the same performance level. Performance (merit) bonuses do not become part of base pay and shall be awarded in a lump sum one-time payment. Such bonuses are subject to the availability of funding.

Section 8. Salary Effect of Promotions, Demotions, Transfers, and Reclassifications

(See Article IV for definitions of these terms)

Promotions. When an employee is promoted to a position with a higher salary grade, the employee's salary shall normally be advanced to the Hiring Rate of the new position, or to a salary which provides an increase of at least approximately 5% over the employee's salary before the promotion, provided, however, that the new salary may not exceed the Maximum rate of the new salary range. The purpose of the promotional pay increase is to recognize and compensate the employee for assuming increased responsibility. The amount of the salary adjustment should be based on:

- a) the employee's related education, training, and experience;
- b) the nature and magnitude of the change in jobs;
- c) budget availability;
- d) consistency with similar situations in the past;
- e) internal equity within the department; and
- f) other relevant issues.

Cost of living (or market adjustment), probationary increases for a previous job, and other in-range increases cannot take the place of a promotional increase. The relative position of the employee's adjusted salary within the new salary range shall not exceed the relative position of the employee's salary in the current range.

Demotions. When an employee is demoted to a position for which qualified, the salary shall be set at the rate in the lower pay range which provides a salary commensurate with the employees' qualifications to perform the job when the demotion is not the result of discipline. If the current salary is within the new range, the employee's salary may be retained at the previous rate, if appropriate. Consideration should be given to whether the employee is receiving the same pay for decreased workload or responsibility level and action should be appropriate to this consideration along with internal equity consideration of the pay rate of other employees in the same classification. If the demotion is the result of disciplinary action, the salary shall be decreased to the same relative position in the new grade that the employee occupied in the old grade.

Transfers. The salary of an employee reassigned to a position in the same class or to a position in a different class within the same salary grade shall not be changed by the reassignment.

Reclassifications. An employee whose position is reclassified to a class having a higher salary range and who is below mid point in the current range shall be placed in the same relative range position in the new grade that the employee occupied in the old grade. If the employee is above the mid point in the current range, the employee will be placed at no greater than the mid point.

If the position is reclassified to a lower pay range, the employee's salary shall remain the same. If the employee's salary is above the maximum established for the new range, the salary of that employee shall be maintained at the current level until the range is increased above the employee's salary.

Section 9. Salary Effect of Salary Range Revisions

When a class of positions is assigned to a higher salary range as a result of labor market conditions,

employees in that class who are below mid point in the current range shall be placed in the same relative range position in the new grade that the employees occupied in the old grade. Employees who are above mid point in the current range will be placed at no greater than the mid point of the new range.

When a class of positions is assigned to a lower salary range, the salaries of employees in that class will remain unchanged. If this assignment to a lower salary range results in an employee being paid at a rate above the maximum established for the new class, the salary of that employee shall be maintained at that level until such time as the employee's salary range is increased above the employee's current salary.

Section 10. Transition to a New Salary Plan

The following principles shall govern the transition to a new salary plan:

- 1) No employee shall receive a salary reduction as a result of the transition to a new salary plan.
- 2) All employees being paid at a rate lower than the Minimum rate established for their respective classes shall have their salaries raised to the new Minimum for their classes. The only exception will be those employees in probationary status and currently being paid at the Hiring, a trainee rate, or in a "work against" status. These employees will remain in their same relative pay status in the new salary grade assigned.
- 3) All employees being paid at a rate above the Minimum and below the Maximum are considered as being paid at a competitive rate for the job class and may receive any approved salary plan implementation increases as authorized by the Board.
- 4) All employees being paid at a rate above the Maximum rate established for their respective classes shall be maintained at that salary level with no increase in base pay until such time as the employees' salary range is increased above the employees' current salary. This means no performance/merit pay increases or market adjustment/cost of living increases or any other increases to the base pay of the employee until the employee is within the appropriate salary range.

Section 11. Effective Date of Salary Changes

Salary changes shall become effective on the official effective date of the change, or at such specific date as may be provided by procedures approved by the County Manager.

Section 12. Overtime Pay Provisions

Employees of the County can be requested and may be required to work overtime hours as necessitated by the needs of the County and determined by the supervisor. All overtime work must be authorized in advance.

Supervisors shall attempt to arrange employee work and schedules so as to accomplish the required work within the standard workweek and without incurring overtime.

The County will comply with the Fair Labor Standards Act (FLSA). The County Manager shall determine which jobs are "Non Exempt" and are therefore subject to the Act in areas such as hours of work and

work periods, rates of overtime compensation, and other provisions.

Non-Exempt Employees: Non-exempt employees will be paid at a straight time rate for hours up to the FLSA established limit for their position (usually 40 hours in a 7 day period or alternative FLSA approved full time schedule). Employees in law enforcement and fire service job classes may earn overtime based on a 28 day time period or other time period as described in FLSA regulations. Hours worked beyond the FLSA established limit will be compensated in time or pay at the appropriate overtime rate. In determining eligibility for overtime in a work period, only hours actually worked shall be considered; in no event will vacation, sick leave, or holidays be included in the computation of hours worked for FLSA purposes.

Whenever practicable, departments will schedule time off on an hour-for-hour basis within the applicable work period for non-exempt employees, instead of paying overtime. When time off within the work period cannot be granted, overtime worked will be given in the form of compensatory time off or paid in accordance with the FLSA. Compensatory leave must be used prior to any sick or annual leave.

Earned compensatory time may be granted whenever feasible and determined by the County Manager, based on recommendations from the Department Head. Accumulation of more than 80 hours of compensatory time is discouraged and must have the approval of the County Manager. However, under FLSA provisions, non-exempt employees may accumulate up to 240 hours of compensatory time (sworn law enforcement, emergency medical service, and fire service employees may accumulate up to 480 hours). Nonexempt employees separating from employment shall be paid for their compensatory time balances.

In declared disaster or emergency situations such as a FEMA declared emergency where employees are required to work long and continuous hours, the County Manager may approve compensation at a rate up to double time for those hours worked and/or grant time off with pay for rest and recuperation to ensure safe working conditions.

Exempt employees: Employees in positions determined to be "exempt" from the FLSA (as Executive, Administrative, or Professional staff) will not receive pay for hours worked in excess of their normal work periods. These employees may be granted compensatory leave by their supervisor where the convenience of the department allows and in accordance with procedures established by the County Manager. Such compensatory time is not guaranteed to be taken and ends without compensation upon separation from the organization.

The County intends to make deductions from the pay of exempt employees for authorized reasons and prohibits improper pay deductions. Exempt employees who wish to question deductions they believe to be improper may use the County's Grievance procedure, as explained in this policy. If the deduction is found to be improper the County will reimburse the employee for lost pay.

In declared disaster or emergency situations requiring long and continuous hours of work, exempt employees may be compensated at a rate of up to double time for the duration of the emergency period, at the approval of the County Manager.

Section 13. On-Call and Call-Back Compensation

The County provides continuous twenty-four hours a day, seven days a week service to its citizens. Any employee of the County, as a condition of employment, may be required to respond to any

reasonable request for duty at any hour of the day or night. One of the conditions of employment with the County is the acceptance of a share of the responsibility for continuous service in accordance with the nature of each job. If an employee fails to respond to reasonable calls for emergency service, either special or routine, the employee may be subject to disciplinary action up to and including dismissal by the Hiring Authority.

On-call. On-call (standby) time consists of scheduled non-work hours in excess of the standard work period when an employee is required to be available to be called back to work on a regularly scheduled or emergency basis and must respond within a reasonable period of time and must not be impaired and able to work. On-call/standby schedules must be approved by the Department Head. The Human Resources Office shall maintain a list of employees who are approved for on-call compensation arrangements. The County Manager will review and approve on-call schedules.

An employee is required by FLSA to be compensated regular pay for on-call time if he or she must remain near an established telephone or otherwise substantially restrict personal activities in order to be ready to respond when called. The County chooses to compensate employees at a rate less than regular pay for the inconvenience of on-call pay when, for example a pager or cell phone is used, and time is not substantially restricted.

The Department of Social Services, Emergency Management, and Animal Control may recommend on-call policies specific to their needs subject to the approval of the County Manager.

Call-back. Call-back time consists of actual time spent when called back to work to handle an emergency situation. Non-exempt employees will be guaranteed a minimum payment of one hour of wages for being called back to work outside of normal working hours when not on stand-by. "Call-back" provisions do not apply to previously scheduled overtime work (scheduled one or more days in advance).

Section 14. Payroll Schedule and Deductions

The payroll schedule shall be established by the County Manager and shall be administered by the Finance Department. Deductions shall be made from each employee's salary, as required by law. Additional deductions may be made upon the request of the employee on determination by the County Manager as to capability of payroll equipment and appropriateness of the deduction.

Section 15. Hourly Rate of Pay for full-time, part-time and Temporary Employees and for Work Weeks with Varying Hours

Employees working in a part-time or temporary capacity with the same duties as full-time employees will work at a rate in the same salary range as the full-time employees. Such employees will normally start at the Hiring Rate.

The hourly rate for employees working other than 40 hours per week, such as employees working 37.5 hours per week and law enforcement officers working an average 42 hours per week, will be determined by dividing the average number of hours scheduled per year into the annual salary established for the position.

Section 16. Longevity Pay

Full-time employees of the County are compensated for continuous years of service with the County by payment of a longevity supplement based on continuous years of service. Continuous service is continuous employment including any approved leave or involuntary reduction in force.

Longevity amounts shall be as follows:

<u>Years of Service</u>	<u>Amount</u>
0 - 1 years	\$ 50
2 - 5 years	\$100
6 - 10 years	\$200
11- 15 years	\$300
16 - 20 years	\$400
21 - 25 years	\$500
26 - 30 years	\$750
31 plus years	\$1,000

Longevity pay will be calculated effective the date of the employee's anniversary and will be issued with the payroll following the employee's anniversary date.

Section 17. Pay for Interim Assignment in a Higher Level Classification

An employee who is formally designated for a period of at least one month to perform the duties of a job that is assigned to a higher salary grade than that of the employee's regular classification shall receive an increase for the duration of the 'interim' assignment. The employee shall receive a salary adjustment to the entry level (Hiring rate) of the job in which the employee is acting or an increase of 10%. Criteria involved in determining the amount of compensation shall include

- a) the difference between the existing job and that being filled on a temporary basis, and
- b) the degree to which the employee is expected to fulfill all the duties of the temporary assignment.

The salary increase shall be temporary and the employee shall go back to the salary he or she would have had if not assigned to the 'acting' role upon completion of the assignment.

ARTICLE IV. RECRUITMENT AND EMPLOYMENT

Section 1. Equal Employment Opportunity Policy

It is the policy of the County to foster, maintain and promote equal employment opportunity. The County shall select employees on the basis of the applicant's qualifications for the job and award them, with respect to compensation and opportunity for training and advancement, including upgrading and promotion, without regard to race, color, religion, sex, sexual orientation, national origin, political affiliation, qualified disability, marital status, or age. Applicants with disabilities shall be given equal consideration with other applicants for positions in which their disabilities do not represent an unreasonable barrier to satisfactory performance of duties.

Section 2. Implementation of Equal Employment Opportunity Policy

All personnel responsible for recruitment and employment will continue to review regularly the implementation of this policy and relevant practices to assure that equal employment opportunity based on reasonable, job-related job requirements is being actively observed to the end that no employee or applicant for employment shall suffer discrimination because of race, color, religion, sex, sexual orientation, national origin, political affiliation, qualified disability, marital status, or age. Notices with regard to equal employment matters shall be posted in conspicuous places on County premises in places where notices are customarily posted.

Section 3. Recruitment, Selection and Appointment

Recruitment Sources. When position vacancies occur, the Human Resources Director shall publicize these opportunities for employment, including applicable salary information and employment qualifications. Information on job openings and hiring practices will be published in local and/or other news media as necessary to inform the community and create a quality and diverse pool of applicants. In addition, notice of vacancies shall be posted at designated conspicuous sites within departments. Individuals shall be recruited from a geographic area as wide as necessary and for a period of time sufficient to ensure that well-qualified applicants are obtained for County service. The North Carolina Employment Security Commission shall normally be used as a recruitment source. In rare situations because of emergency conditions, high turnover, etc., the County may hire or promote without advertising jobs, upon approval of the County Manager.

Job Advertisements. Employment advertisements shall contain assurances of equal employment opportunity and shall comply with Federal and State statutes.

Application for Employment. All persons expressing interest in employment with the County shall be given the opportunity to file an application for employment for positions which are currently being recruited.

Applicant Interest Card. Persons interested in employment with the County may complete an applicant interest card concerning all of the positions for which they wish to apply. These cards will be maintained for a period of six months. When a vacancy occurs in positions of interest, the card will be sent, notifying the person and requesting that the person complete an application before the designated deadline.

Application Reserve File. Applications shall be kept in an inactive reserve file for a period of two years, in accordance with Equal Employment Opportunity Commission guidelines.

Selection. Department heads, with the assistance of the Human Resources Director, shall make such investigations and conduct such examinations as necessary to assess accurately the knowledge, skills, abilities, physical requirements, certifications, and experience qualifications required for the position. All selection devices administered by the County shall be valid measures of job performance.

Appointment. Before any commitment is made to an applicant either internal or external, the Hiring Authority shall provide to the Human Resources Director the position to be filled, the salary to be paid, and the reasons for selecting the candidate over other candidates. The Human Resources Director shall review the provided information against established County policy and procedures and based upon the review, provide a recommendation on the appointments and the starting salary for all applicants to the Hiring Authority. All employment offers should be confirmed in writing. The Personnel Action Form, the original application for employment, a copy of the employment offer letter, and any additional supporting documents pertaining to the selected candidate should be submitted to the Human Resources Director prior to the beginning date of employment. The documents will become part of the new employees personnel file.

Section 4. Probationary Period

An employee appointed or promoted to a regular position shall serve a probationary period. Employees shall serve a nine month probationary period, except that sworn law enforcement personnel and department heads shall serve a twelve-month probationary period. Employees in trainee or "work against" appointments will have specific time frames established for their probationary period.

During the probationary period, supervisors shall monitor an employee's performance and communicate with the employee concerning performance progress. Employees will participate in an interim probationary review conference at the half point of their probationary periods, a summary of which will be documented in the employee's official personnel file.

Before the end of the probationary period, the supervisor shall determine whether or not the employee is performing satisfactory work and meeting job expectations. The employee's progress (accomplishments, strengths, and areas for improvement) will be discussed with the employee and a summary of this discussion should be documented in the employee's personnel file. The supervisor shall recommend in writing whether the probationary period should be completed, extended, or the employee transferred, demoted, or dismissed. Probationary periods may be extended for three months with the possibility of one more 3 month extension for a maximum of six months. The maximum probationary period for law enforcement officers and department heads is eighteen months and for other County employees is fifteen months.

Disciplinary action, including demotion and dismissal, may be taken at any time during the probationary period of a new hire without following the steps outlined in this Policy. A promoted employee who does not successfully complete the probationary period may be transferred or demoted to a position in which the employee shows promise of success. If no such position is available, the employee shall be dismissed. Promoted employees shall retain all other rights and benefits such as the right to use of the grievance procedures.

Section 5. Promotion

Promotion is the movement of an employee from one position to a vacant position in a class assigned to a higher salary range. It is the County's policy to create career opportunities for its employees whenever possible. Therefore, when a current employee applying for a vacant position is best suited of

all applicants, that applicant shall be promoted to that position. The County will balance three goals in the employment process:

- a) the benefits to employees and the organization of promotion from within;
- b) providing equal employment opportunity and a diversified workforce to the community; and
- c) obtaining the best possible employee who will provide the most productivity in that position.

Therefore, except in rare situations where previous County experience is essential or exceptional qualifications of an internal candidate so indicate, the County will consider external and internal candidates rather than automatically promote from within. Candidates for promotion shall be chosen on the basis of their qualifications and their work records. Internal candidates shall apply for promotions using the same application process as external candidates.

Section 6. Demotion

Demotion is the movement of an employee from one position to a position in a class assigned to a lower salary range. Demotions may be voluntary or involuntary. An employee whose work or conduct in the current position is unsatisfactory may be involuntarily demoted provided that the employee shows promise of becoming a satisfactory employee in the lower position. Such demotion shall follow the disciplinary procedures outlined in this policy. Demoted employees may appeal this decision based on the Grievance Process outlined in this Personnel Policy.

An employee may request a voluntary demotion when a vacant position is available. Employees may request voluntary demotions in order to accept a position with less complex duties and reduced responsibilities, to change career paths, or for other reasons. A voluntary demotion is not a disciplinary action and is made without using the above-reference disciplinary procedures.

Section 7. Transfer

Transfer is the movement of an employee from one position to a position in a class in the same salary range. If a vacancy occurs and an employee in another department is eligible for a transfer, the employee shall apply for the transfer using the usual application process. The Department Head wishing to transfer an employee to a different department or classification shall make a recommendation to the County Manager. Any employee transferred without requesting the action may appeal the action in accordance with the grievance procedure outlined in this policy. Employees who are transferred to a different department will serve a six month probationary period.

ARTICLE V. CONDITIONS OF EMPLOYMENT

Section 1. Work Schedule

Department heads shall establish work schedules, with the approval of the County Manager, which meet the operational needs of the department in the most cost effective manner possible.

Section 2. Political Activity

Each employee has a civic responsibility to support good government by every available means and in every appropriate manner. Each employee may join or affiliate with civic organizations of a partisan or political nature, may attend political meetings, may advocate and support the principles or policies of civic or political organizations in accordance with the Constitution and laws of the State of North Carolina and in accordance with the Constitution and laws of the United States. However, no employee shall:

- a) Engage in any political or partisan activity while on duty;
- b) Use official authority or influence for the purpose of interfering with or affecting the result of a nomination or an election for office;
- c) Be required as a duty of employment or as condition for employment, promotion or tenure of office to contribute funds for political or partisan purposes;
- d) Coerce or compel contributions from another employee of the County for political or partisan purposes;
- e) Use any supplies or equipment of the County for political or partisan purposes; or
- f) Be a candidate for nomination or election to the office of Vance County Commissioner. Employees may be a candidate for any other office. Employees who wish to run for County Commissioner must first resign.

Where appropriate, the County will comply with all federal Hatch Act requirements. Any violation of this section shall be deemed improper conduct and shall subject the employee to disciplinary action under this policy.

Section 3. Expectation of Ethical Conduct

The proper operation of County government requires that public officials and employees be independent, impartial, and responsible to the people; that governmental decisions and policy be made in the proper channels of the governmental structure; that public office not be used for personal gain; and that the public have confidence in the integrity of its government.

As stewards of public resources and holders of the public trust, County employees are expected to uphold the highest standards of ethical conduct while fulfilling their job duties and responsibilities.

No employee of the County shall accept any gift, favor, or thing of value (more than \$25) from organizations, business firms, or individuals with whom they have official relationships because of County business. These limitations do not prohibit the acceptance of articles of negligible value which

are distributed generally, nor prohibit employees from accepting social courtesies that provide good public relations, not prohibit employees from obtaining loans from public lending institutions. It is particularly important that inspectors, contracting officers, and law enforcement officers guard against relationships that might be construed as evidence of favoritism, coercion, unfair advantage, or collusion.

Section 4. Outside Employment

The work of the County shall have precedence over other occupational interests of employees. All outside employment for salaries, wages, compensation, or commission and all self-employment must be reported in advance to the employee's supervisor, who in turn will report it to the Hiring Authority. The Hiring Authority will review such employment for possible conflict of interest and then approve or disapprove the secondary employment. The County Manager may choose to delegate such approval authority to department heads. Documentation of the approval of outside employment will be placed in the employee's personnel file.

Examples of conflicts of interest in outside employment *include but are not limited to*:

- a) employment with organizations or in capacities that are regulated by the employee or employee's department; or
- b) employment with organizations or in capacities that negatively impact the employee's perceived integrity, neutrality, or reputation related to performance of the employee's County duties.

Off the job injuries: An employee who sustains an injury or illness in connection with outside employment shall not be eligible to use accrued sick leave.

Section 5. Dual Employment

A full or part-time employee of the County may simultaneously hold another position with the County if the temporary position is in a different department or agency and substantially different capacity and occupational area from that of the full or part-time position. The work must also be performed on an occasional or sporadic basis. Any other situation requires weighted average pay scales and/or overtime pay. However, the work of the full or part-time position shall take precedence over the temporary position.

Section 6. Employment of Relatives (Nepotism)

The County prohibits the hiring and employment of immediate family in permanent positions within the same department. Except for the Sheriff, Register of Deeds, Department of Social Services and Elections, the County prohibits the employment of immediate family into a permanent position of individuals holding the following positions: County Board of Commissioners Member, County Manager, Deputy County Manager, Human Resources Director, Human Resources Support Staff, Clerk to the Board, Finance Director, Finance Support Staff, IT Director, IT Support Staff, or County Attorney. For those excepted from this provision, the County prohibits the employment of any person into a permanent position who is an immediate family member of individuals holding the following positions: a Board Member who is a member of the Board which oversees such office, their Director, Assistant Director, Human Resources and related Support Staff, Clerk to their Board, Finance/Business Officer and related staff, or Attorney. Otherwise, the County will consider employing immediate family or related persons in the service of the County, provided that such employment does not:

- a) result in a relative supervising relatives;
- b) result in a relative auditing the work of a relative
- c) create a conflict of interest with either relative and the County; or
- d) create the potential or perception of favoritism.

This clause shall not be retroactive concerning any relative currently working for the County or anyone who has filed for election at the time of adoption. However, it does require that a prohibited employee resign should a relative be elected as a County Commissioner.

This section also prohibits the Sheriff, Register of Deeds, Social Services Director, and Elections Director from hiring or employing their immediate family members in the departments that they supervise.

Section 7. Workplace Romance

For the purposes of this policy, workplace romance is defined as a relationship that may be reasonably expected to lead to the formation of a consensual "romantic" or sexual relationship. This policy applies to all employees without regard to the gender or sexual orientation of the individuals involved.

Workplace romance is strictly prohibited for employees within the same department.

Section 8. Harassment

Harassment on the basis of race, color, religion, sex, sexual orientation, national origin, age or disability constitutes discrimination. The County opposes harassment by supervisors and co-workers in any form. Harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, gender, national origin, age, or disability, or that of his or her relatives, friends, or associates.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Any employee who believes that he or she may have a complaint of harassment may follow the Grievance Procedure described in this Policy or may file the complaint directly with the County Manager, Human Resources Director, or any department head who will advise the Human Resources Director of the complaint. The Human Resources Director will insure that an investigation is conducted into any allegation of harassment and advise the employee and appropriate management officials of the outcome of the investigation.

Employees witnessing harassment shall also report such conduct to an appropriate County official.

Section 9. Use of County Time, Equipment, Supplies, and Vehicles

County supplies and equipment are to be used exclusively for the County's business. During working hours, an employee shall only conduct County business. Use of County time, supplies, or equipment for personal or other purposes not related to the employee's County duties and responsibilities is prohibited and subjects the employee to disciplinary action, up to and including dismissal.

All employees, who use County vehicles, are required to follow applicable motor vehicle and safety requirements. Violation or misuse of County vehicles also subjects the employee to disciplinary action, up to and including dismissal.

County equipment, materials, tool and supplies, shall not be available for personal use and are not to be removed from County property except in the conduct of official County business, unless approved by the Board. No employee shall purchase for personal use any equipment or supplies through County purchase accounts.

The County shall develop and distribute to employees a separate policy covering the use of phones, email, computers, and county cell phones.

Under North Carolina law, all electronic messages sent or received in conducting the County's business is considered a public record and is subject to inspection upon request, regardless of the device or means used.

Surrender of Property. An employee who terminates employment shall be required to return all items of equipment, including uniforms, keys, key passes, etc. owned by the County within 24 hours.

Section 10. Performance Evaluation

Supervisors and/or Department Heads shall conduct Performance Evaluation conferences with each employee at least once a year. These performance evaluations shall be documented in writing and placed in the employee's personnel file. Procedures for the performance evaluation program shall be published by the County Manager. (Refer to Article IX, Section 2).

Section 11. Safety

Safety is the responsibility of both the County and employees. It is the policy of the County to establish a safe work environment for employees. The County shall establish a safety program including policies and procedures regarding safety practices and precautions and training in safety methods. Department Heads and supervisors are responsible for insuring the safe work procedures of all employees and providing necessary safety training programs. Employees shall follow the safety policies and procedures and attend safety training programs. Employees who violate such policies and procedures shall be subject to disciplinary action up to and including dismissal.

Additional detailed procedures regarding safety, worker's compensation, injury, and infection control may be established by the County Manager.

Section 12. Immigration Law Requirements

All employees are required to furnish proof of citizenship or other required documents indicating a legal

right to work in the United States. Copies of the completed I-9 form shall be a permanent part of their personnel file.

Section 13. Substance Abuse

The County is firmly committed to maintaining a drug and alcohol free work environment in order to insure the safety and welfare of the general public and all County employees and to insure an efficient and effective work force. The County also seeks to aid employees experiencing substance abuse problems by offering rehabilitation opportunities. The County Manager has the authority to establish, administer, and enforce substance abuse processes and procedures within the County.

Section 14. Credentials and Certifications

Some duties assigned to positions in local government service may be performed only by persons who are duly licensed, registered or certified as required by the relevant law, rule or regulation. Employees in such classifications are responsible for maintaining current, valid credentials as required by law, rule or regulation. Failure to obtain or maintain the required credentials is a basis for immediate dismissal without prior warning. An employee who is dismissed shall be given a written statement of the reason for the action and his/her appeal rights.

ARTICLE VI. EMPLOYEE BENEFITS

Section 1. Eligibility

All part-time and full-time employees of the County who are in permanent positions are eligible for employee benefits as provided for in this Article which are subject to change at the County's discretion. Hourly employees are only eligible for workers' compensation and social security.

Section 2. Group Health and Hospitalization Insurance

The County provides group health and hospitalization insurance programs for full-time employees.

Section 3. Group Life Insurance

The County provides paid life insurance to its employees. Information on costs, coverage, and benefits are available from the Human Resources Director.

Section 4. Other Optional Group Insurance Plans

The County may make other group insurance plans available to employees upon authorization of the County Manager or County Board of Commissioners.

Section 5. Retirement

Each employee in a permanent position who is expected to work for the County more than 1,000 hours annually shall join the North Carolina Local Governmental Employees' Retirement System when eligible as a condition of employment.

Employees contribute, through payroll deduction, six per cent of their gross salary to the system. The County contributes an actuarially determined percentage of the gross payroll each month to the system.

Provisions of this system are further outlined in the North Carolina Local Government Employees' Retirement System web site on the NC State Treasurer's web site.

Retiree Health Insurance

Each employee in a permanent position who is expected to work for the County more than 1,000 hours annually shall join the North Carolina Local Governmental Employees' Retirement System when eligible as a condition of employment.

Employees contribute, through payroll deduction, six per cent of their gross salary to the system. The County contributes an actuarially determined percentage of the gross payroll each month to the system.

Provisions of this system are further outlined in the North Carolina Local Government Employees' Retirement System web site on the NC State Treasurer's web site.

The County will provide retiree insurance to eligible employees of no more than an amount equal to active employees' premium, which said benefit and/or premium may be subject to change as directed by the governing body.

ELIGIBILITY REQUIREMENTS:

- If hired before July 1, 2011: Employee must retire with the North Carolina Local Governmental Employees' Retirement System (LGERS) and have worked at least 15 consecutive years with Vance County as a full-time employee. Service time credit with the County will be calculated based on actual service time.

Medicare Supplement: Insurance coverage will continue until the employee becomes eligible for Medicare, at which time the County will convert coverage to a Medicare Supplement policy.

- If hired on or after July 1, 2011: Employee must retire with the LGERS and have worked at least 30 consecutive years as a full-time employee to be eligible for this county-paid benefit. Coverage for the Medicare Supplement is the same as stated above.
- If hired on or after July 1, 2011 and the employee has at least 15 consecutive years with Vance County as a full-time employee, is at least age 55 or older and retires with the LGERS, the employee can participate with the retiree insurance program at his/her cost. (This requirement includes Disability Retirements).

Medicare Supplement: No coverage will be available through the County.

Section 6. Supplemental Retirement Benefits (401-K)

The County allows employees to defer a portion of their income before taxes into a 401-K tax deferment plan. The County provides contributions of 5% to a 401-K plan for active law enforcement personnel as required by the state, and an amount to be determined by the County Commissioners to other full and part-time employees.

The County may choose to offer other deferred compensation or supplemental programs.

Section 7. Social Security

The County, to the extent of its lawful authority and power, has extended Social Security benefits for its eligible employees and eligible groups and classes of such employees.

Section 8. Workers' Compensation

All employees of the County (full-time, part-time, and temporary) are covered by the North Carolina Workers' Compensation Act and are required to report all injuries arising out of and in the course of employment to their immediate supervisors at the time of the injury and no later than 24 hours following the accident or injury in order that appropriate action may be taken.

Employees may use sick leave and/or vacation during the waiting period before Workers' compensation benefits begin, except that employee may not exceed the regular salary amount using this provision. This provision also applies to reactions to small pox vaccinations administered to County employees under Section 304 of the Homeland Security Act. Such reactions shall be treated the same as any other workers compensation claim as regards leave and salary continuation.

Responsibility for claiming compensation under the Workers' Compensation Act is on the injured employee and the supervisor and such claims must be filed by the employee with the North Carolina

Industrial Commission within two years from date of injury. The Human Resources Director or designee will coordinate the filing of such claims.

Section 9. Unemployment Compensation

County employees are covered by unemployment insurance. County employees who are terminated due to a reduction in force or released from County service may apply for benefits through the local Employment Security Commission office, where a determination of eligibility will be made.

Section 10. Tuition Assistance Program

Full-time employees who have completed initial probation may apply for tuition reimbursement for courses taken on their own time, which will improve their skills for their current job or prepare them for promotional opportunities within the County service. Tuition, registration, fees, laboratory fees, and student fees are eligible expenses. Employees may be reimbursed eligible expenses up to a total of eight hundred dollars (\$800) per fiscal year. Satisfactory completion of the courses will be required for reimbursement. Requests for tuition assistance shall be submitted to the Human Resources Office prior to course registration and are subject to the review and approval of Department Head and County Manager, subject to availability of funds.

Section 11. Credit Union

Membership in the Local Government Employees' Credit Union is open to all County employees for various loan services, checking, and savings accounts. Membership in the State Employees' Credit Union is open to all employees under the State Personnel Act and their family members for various loan services, checking, and savings accounts.

Section 12. Law Enforcement Separation Allowance

Every sworn law enforcement officer, as defined by N.C. G. S. 128-21(11d) or N.C. G. S. 143-166.50, shall be eligible for a separation allowance, as provided by N.C. G. S. 143-166.42, in the amount specified in N.C. G. S. 143-166.41(a). The purpose of this allowance is to provide additional income until the law enforcement officer is eligible for social security benefits with the consideration that the law enforcement officer may no longer be able to perform law enforcement work. Given this purpose, eligibility and continuation of these benefits are subject to the following conditions:

- a. The officer shall have completed 30 or more year of creditable service, or have attained 55 years of age and completed five or more years of creditable service; and
- b. Not have attained 62 years of age;
- c. Have completed at least five years of continuous service as a law enforcement officer immediately preceding a service retirement from Vance County, as defined by N.C. G. S. 143-166.41(a)(3) and 143-166.41(b); and
- d. The law enforcement officer, after separation from employment with the County, notifies the County of any new job involving state, local or federal employment. Such notification shall, include the nature and extent of the employment, any change of employment status, and any discontinuation of employment, within five (5) days of the new employment, change or discontinuation.

Such allowance shall terminate at death, or on the last day of the month prior to which the officer attains 62 years of age, or upon the first day of re-employment by any federal, State or local, agency or institution, whether in North Carolina or elsewhere in a job scheduled for 1,000 or more hours per year. Should the employee fail to notify the County of such employment, the County will seek reimbursement for any payments made after such employment.

ARTICLE VII. HOLIDAYS AND LEAVES OF ABSENCE

Section 1. Policy

The policy of the County is to provide vacation leave, sick leave, and holiday leave to all full-time and part-time employees in a regular position with the County and to provide proportionally equivalent amounts to employees having average work weeks of different lengths. Leave balances should accrue with each payroll at a pro-rated amount when employees work or are on a paid leave status. Leave balances should be printed on payroll checks or provided to employees with each paycheck, including net accrued sick leave and vacation.

Section 2. Holidays

The policy of the County is to follow the holiday schedule as published by the State of North Carolina each year. The schedule for the calendar year will be published by December 15 of the previous calendar year for distribution to County employees.

The number of holiday hours earned by employees shall be determined in accordance with the formula set forth in Section 15 of this article.

Departments which have staff working during holidays may designate which days of the week are to be observed using the actual legal holidays when appropriate.

Section 3. Holidays: Effect on Other Types of Leave

Regular holidays which occur during a vacation, sick or other leave period of any employee shall not be considered as vacation, sick, or other leave.

Section 4. Holidays: Compensation When Work is Required/Shift Work

Employees required to perform work on regularly scheduled holidays shall be paid for the holiday as well as receiving regular pay. Holiday pay shall be at the number of hours described in Section 15 of this Article. If a holiday falls on a regularly scheduled off-duty day for shift personnel, the employee shall receive pay for the proportionately equivalent holiday leave hours.

Employees who work shifts for 911, Fire, Emergency Medical Services, and the Sheriff's Department and who must work on the holiday will be paid for the holiday in lieu of taking a day off. The policy of the County is to follow the holiday schedule as published by the State of North Carolina each year. However, Public Safety employees who work shift assignments will observe the actual holiday.

Any (planned or unexpected) absence on a holiday will result in the holiday pay being forfeited.

Section 5. Vacation Leave

Vacation leave may be used for rest and relaxation, school appointments, medical appointments, and other personal needs. Employees must request vacation leave from their supervisor in advance. Vacation leave may also be used by employees who wish to observe religious holidays other than those granted by the County, upon request in advance. Supervisors are responsible for insuring proper staff coverage and may refuse vacation requests when they create a hardship for the County.

Section 6. Vacation Leave: Use by Probationary Employees

Employees serving a probationary period following initial employment may accumulate vacation leave but shall not be permitted to take vacation leave during the first six months of employment unless agreed upon in initial conditions of employment.

Section 7. Vacation Leave: Accrual Rate

Each full and part-time employee of the County shall earn vacation at the following schedule, prorated by the regular number of hours in the workweek as described in Section 15 of this article:

Years of Service	Days Accrued Per Year
0 - 2	12
2 - 5	14
5 - 10	17
10 - 15	20
15 plus	22

Vacation should be accrued in each payroll period.

Section 8. Vacation Leave: Maximum Accumulation

Vacation leave may be accumulated without any applicable maximum until December 31 of each year. Effective the last payroll in the calendar year, any employee with more than 30 days of accumulated leave shall have the excess accumulation removed so that only 30 days are carried forward to January 1 of the next calendar year. Employees may have the entire excess amount converted to sick leave provided that the employee has taken a minimum of three consecutive days of vacation by December 15 of the current calendar year.

Because the number of hours in employee work weeks vary, the number of hours in 30 days varies. See Section 15 of this Article for formula to calculate the number of hours in 30 days.

Employees are cautioned not to retain excess accumulated vacation leave until late in the year. Because of the necessity to keep all functions in operation, large numbers of employees cannot be granted vacation leave at any one time. If an employee has excess leave accumulation during the latter part of the year and is unable to take such leave because of staffing demands, the employee shall receive no special consideration either in having vacation leave scheduled or in receiving any exception to the maximum accumulation. Employees may not receive pay for excess vacation time.

Section 9. Vacation Leave: Manner of Taking

Employees shall be granted the use of earned vacation leave upon request in advance at those times designated by the Department Head which will least obstruct normal operations of the County. Department heads are responsible for insuring that approved vacation leave does not hinder the effectiveness of service delivery. Vacation leave will be taken in half hour units.

Section 10. Vacation Leave: Payment upon Separation

An employee who has successfully completed nine months of the probationary period will normally be paid for accumulated annual leave upon separation subject to the 30-day maximum, provided notice is given to the supervisor at least two weeks in advance of the effective date of resignation. Any employee

failing to give the notice required by this section shall forfeit payment for accumulated leave. The notice requirement may be waived by the County Manager when deemed to be in the best interest of the County.

Regular employees who are involuntarily separated shall receive payment for accumulated annual leave subject to the 30-day maximum.

Section 11. Vacation Leave: Payment upon Death

The estate of an employee who dies while employed by the County shall be entitled to payment of all the accumulated vacation leave credited to the employee's account not to exceed the 30 day maximum.

Section 12. Sick Leave

Sick leave with pay is not a right which an employee may demand, but a privilege granted for the benefit of an employee when sick. Sick leave may be granted to an employee absent from work for any of the following reasons: sickness, bodily injury, required physical or dental examinations or treatment, or exposure to a contagious disease, when continuing work might jeopardize the health of others.

Sick leave may be used when an employee must care for a member of his or her immediate family who is ill, but may not be used to care for healthy children when the regular care giver is sick.

Sick leave may also be used to supplement Workers' Compensation Disability Leave during the waiting period before Workers' Compensation benefits begin.

Notification of the desire to take sick leave should be submitted to the employee's supervisor prior to the leave or not later than two hours after the beginning of the scheduled workday. Failure to do so appropriately may result in disciplinary action.

In order to facilitate the recruitment of qualified persons with appropriate public sector experience, the County Manager may authorize the carry-over of all or a portion of the unused sick leave that has been certified as accumulated during employment with a past state or local government employer under the State or Local Government Employees Retirement System.

Section 13. Sick Leave: Accrual Rate and Accumulation

Sick leave shall accrue at a rate of one day per month of service or twelve days per year. Sick leave for full-time and part-time employees working other than the basic work schedule shall be prorated as described in this Article. Sick leave will be cumulative for an indefinite period of time and may be converted upon retirement for service credit consistent with the provisions of the North Carolina Local Government Employees' Retirement System.

All sick leave accumulated by an employee shall end and terminate without compensation when the employee resigns or is separated from the County, except as stated for employees retiring or terminated due to reduction in force.

Section 14. Sick Leave: Medical Certification

The employee's supervisor or Department Head may require a physician's certificate stating the nature of the employee or immediate family member's illness and the employee's capacity to resume duties, for each occasion on which an employee uses sick leave or whenever the supervisor observes a

"pattern of absenteeism." The employee may be required to submit to such medical examination or inquiry as the Department Head deems desirable. The Department Head shall be responsible for the application of this provision to the end that:

- a) Employees shall not be on duty when they might endanger their health or the health of other employees; and
- b) There will be no abuse of leave privileges.

Claiming sick leave under false pretense to obtain a day off with pay shall subject the employee to disciplinary action.

Section 15. Leave Pro-Rated

Holiday, annual, and sick leave earned by full-time and part-time employees with fewer or more hours than the basic work week shall be determined by the following formula:

- 1) The number of hours worked by such employees shall be divided by the number of hours in the basic work week (usually 40 hours).
- 2) The proportion obtained in step 1 shall be multiplied by the number of hours of leave earned annually by employees working the basic work week.
- 3) The number of hours in step 2 divided by 12 shall be the number of hours of leave earned monthly by the employees concerned.

Section 16. Leave Without Pay

A full or part-time employee who are eligible for benefits may be granted a leave of absence without pay for a period of up to six months by the County Manager. The leave shall be used for reasons of personal disability after both sick leave and annual leave have been exhausted, sickness or disability of immediate family members, continuation of education, special work that will permit the County to benefit by the experience gained or the work performed, or for other reasons deemed justified by the County Manager.

The employee shall apply in writing to the Department Head for leave. The employee is obligated to return to duty within or at the end of the time determined appropriate by the County Manager. Upon returning to duty after being on leave without pay, the employee shall be entitled to return to the same position held at the time leave was granted or to one of like classification, seniority, and pay. If the employee decides not to return to work, the Department Head shall be notified immediately. Failure to report at the expiration of a leave of absence, unless an extension has been requested, shall be considered a resignation.

The County reserves the right to require a physician's statement if it appears there is a pattern or incident of abuse of leave.

Section 17. Family Medical Leave

The County will grant up to 12 weeks of family and medical leave during any 12-month period beginning on the date leave is first used to eligible employees in accordance with the Family and Medical Leave Act of 1993 (FMLA). Eligible employees must have regular status and must have been

employed at least twelve months and worked at least 1,250 hours during the previous twelve months. The leave may be paid (coordinated with the County's Vacation and Sick Leave policies), unpaid, or a combination of paid and unpaid. Additional time away from the job beyond the 12-week period may be considered in accordance with the County's Leave Without Pay policy. Employees are required to exhaust eligible paid leave before going on a leave without pay status.

FMLA leave may be taken for the following reasons:

- (a) to care for the employee's child after birth or placement for adoption or foster care;
- (b) to care for the employee's spouse, child or parent who has a serious health condition; or
- (c) for a serious health condition that makes the employee unable to perform the employee's job.

Use of earned compensatory leave may count toward FMLA leave.

A serious health condition is defined as a condition which requires inpatient care at a hospital, hospice, or residential medical care facility, or a condition which requires continuing care by a licensed health care provider. This policy covers illness of a serious and long-term nature resulting in recurring or lengthy absences. Generally, a chronic or long term health condition which results in a period of incapacity for more than three days would be considered a serious health condition.

If a husband and wife both work for the County and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (not parent in-law) with a serious health condition, the husband and wife together may only take a total of 12 weeks leave under FMLA.

An employee taking leave for the birth of a child may use paid sick leave for the period of actual disability, based on medical certification. The employee may then use paid vacation for the remainder of the 12-week period.

The request for the use of leave must be made in writing by the employee and approved by the department head or County Manager. The County may also designate qualified leave as FMLA Leave by notifying the employee of such action.

An employee who takes leave under this policy will return to the same job or a job with equivalent status, pay, benefits, and other employment terms. The position will be the same or one which entails substantially equivalent skill, effort, responsibility, and authority.

Section 18. Family and Medical Leave: Medical Certification

In order to qualify for leave under this law, the County requires medical certification. This statement from the employee's or the family member's physician should include the date when the condition began, its expected duration, diagnosis, and brief statement of treatment. For the employee's own health condition, it should state that the employee is unable to perform the essential functions of his/her position. For a seriously ill family member, the certification must include a statement that the patient requires assistance and the employee's presence would be beneficial or desirable.

This certification should be furnished at least 30 days prior to the needed leave unless the employee's or family member's condition is a sudden one. The certification should be furnished as soon as possible (no longer than 15 days from the date of the employee's request). The certification and request must be made to the department head and filed with the Human Resources Director.

Amendment to the Vance County Personnel Policy Manual
Effective 4/01/2020

Article VII. Section 20. Workers' Compensation Leave

An employee absent from duty because of sickness or disability covered by the North Carolina Workers' Compensation Act may elect to use accrued sick leave, vacation, or compensatory time during the first waiting period. An employee on workers' compensation leave may be permitted to continue to be eligible for benefits under the County's group insurance plans and the County will continue regular health and other insurance coverage (those for which the County normally pays) for the first **six** months of workers' compensation leave. **At the end of the six months, the employee will be offered COBRA. All medical claims associated with the injury will continue to be covered under the laws of the Workers Compensation Act, Section 97-25.** When workers' compensation leave extends long enough for the waiting period to be reimbursed, the employee shall return the reimbursement check to the County and have leave hours reinstated for all time covered by paid leave. In such cases the County will pay the employee for any unpaid time that is owed the employee.

- a) All injuries arising out of, and during, the course of employment should be reported by the injured employee to the immediate supervisor as soon as possible. The supervisor or department head shall file an injury report with Human Resources within twenty-four (24) hours of the time of the accident. The employee must use sick leave, vacation leave or comp time for the first seven (7) days of disability. These days will be reimbursed only if the disability continued for more than twenty-one (21) days.
- b) Before returning to work, a statement from the attending physician should be submitted to the Human Resources Director giving permission for the employee to resume regular duties.
- c) Upon return to work, the employee's salary will be computed on the basis of the last salary plus any merit increment or other salary increase to which the employee would have been entitled during the disability covered by Workers' Compensation. While receiving workers' compensation benefits, an employee continues to earn sick and annual leave and will retain all accumulated sick and annual leave.

This provision also applies to reactions to small pox vaccinations administered to County employees under Section 304 of the Homeland Security Act. Such reactions shall be treated the same as any other Workers Compensation claim as regards leave and salary continuation.

The employee is expected to return to work at the end of the time frame stated in the medical certification, unless he/she has requested additional time in writing under the County's Leave Without Pay policy.

Section 19. Family Medical Leave and Leave Without Pay: Retention and Continuation of Benefits

When an employee is on leave under FMLA, the County will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work. If an employee chooses not to return to work for reasons other than a continued serious health condition, the County will require the reimbursement of the amount paid for the employee's health insurance premiums during the FMLA leave period.

Other insurance and payroll deductions are the responsibility of the employee and the employee must make those payments for continued coverage of that benefit.

An employee may retain all unused vacation and sick leave while on non-FMLA Leave Without Pay. An employee ceases to earn leave credits on the date leave without pay begins. The employee may continue to be eligible for benefits under the County's Group insurance plans at his or her own expense, subject to any provisions approved by the County Manager and the regulations of the insurance carrier. The County will continue to pay for health and other insurances for which the County normally pays during the first three months of workers' compensation leave.

Section 20. Workers' Compensation Leave

An employee absent from duty because of sickness or disability covered by the North Carolina Workers' Compensation Act may elect to use accrued sick leave, vacation, or compensatory time during the first waiting period. An employee on workers' compensation leave may be permitted to continue to be eligible for benefits under the County's group insurance plans and the County will continue regular health and other insurance coverage (those for which the County normally pays) for the first three months of workers' compensation leave. When workers' compensation leave extends long enough for the waiting period to be reimbursed, the employee shall return the reimbursement check to the County and have leave hours reinstated for all time covered by paid leave. In such cases the County will pay the employee for any unpaid time that is owed the employee.

- a) All injuries arising out of, and during, the course of employment should be reported by the injured employee to the immediate supervisor as soon as possible. The supervisor or department head shall file an injury report to the Human Resources Director within twenty-four (24) hours of the time of the accident. The employee must use sick leave or annual leave for the first seven (7) days of disability. These days will be reimbursed only if the disability continued for more than twenty-one (21) days.
- b) Before returning to work, a statement from the attending physician should be submitted to the Human Resources Director giving permission for the employee to resume regular duties.
- c) Upon return to work, the employee's salary will be computed on the basis of the last salary plus any merit increment or other salary increase to which the employee would have been entitled during the disability covered by Workers' Compensation. While receiving workers' compensation benefits, an employee continues to earn sick and annual leave and will retain all accumulated sick and annual leave.

This provision also applies to reactions to small pox vaccinations administered to County employees under Section 304 of the Homeland Security Act. Such reactions shall be treated the same as any other Workers Compensation claim as regards leave and salary continuation.

Section 21. Military Leave

The County will comply with the provisions of USERRA (Uniformed Services Employment and Re-employment Rights Act) and other required laws and regulations. Regular employees who are members of an Armed Forces Reserve organization or National Guard shall be granted ten workdays per year for military leave without pay. On rare occasions due to annual training being scheduled on a federal fiscal year basis, an employee may be required to attend two periods of training in one calendar year. For this purpose only, an employee shall be granted an additional ten days of military leave during the same calendar year. If the compensation received while on military leave is less than the salary that would have been earned during this same period as a County employee, the employee shall receive partial compensation equal to the difference in the base salary earned during this same period as a County employee. The effect will be to maintain the employee's salary at the normal level during this period.

If such duty is required beyond this ten workdays, the employee shall be eligible to take accumulated vacation leave or be placed in a leave without pay status, and the provisions of that leave shall apply.

While taking military leave without pay or with partial pay, the employee's leave credits and other benefits shall continue to accrue as if the employee physically remained with the County during this period. Employees who are eligible for military leave have all job rights specified by the Vietnam Veterans Readjustment Act, including members of the National Guard or a reserve unit.

Employees who volunteer for additional duty may use vacation, compensatory time or leave without pay. If there is a compensatory balance, it should be used first for nonexempt employees.

Section 22. Reinstatement Following Military Service.

The County will fully comply with the provisions of USERRA and other required laws and regulations. An employee called to extended active duty with the United States military forces, who does not volunteer for service beyond the period for which called, shall be reinstated with full benefits provided the employee:

- a) Applies for reinstatement within ninety days after the release from military service; and
- b) Is able to perform the duties of the former position or similar position; or
- c) Is unable to perform the duties of the former position or a similar position due to disability sustained as a result of military service, but is able to perform the duties of another position in the service of the County. In this case the employee shall be employed in such other position as will provide the nearest approximation of the seniority, status, and pay which the employee otherwise would have been provided, if available.

Employees called to active duty must provide a copy of the orders to the Human Resources Director in advance.

Section 23. Civil Leave

A County employee called for jury duty or as a court witness for the federal or state governments, or a subdivision thereof, shall receive leave with pay for such duty during the required absence without charge to accumulated leave. The employee may keep fees and travel allowances received for jury or witness duty in addition to regular compensation; except, that the employee must turn over to the County any witness fees or travel allowance awarded by that court for court appearances in connection with official duties. While on civil leave, benefits and leave shall accrue as though on regular duty.

Section 24. Parental School Leave

Under NC General Statutes 95-28.3, a County employee who is a parent, guardian, or person standing in loco parentis (in place of the parent) may take up to four hours of unpaid leave annually to involve him or herself in school activities of his or her child(ren). This leave is subject to the three following conditions:

- 1) The leave must be taken at a time mutually agreed upon by the employee and the County;
- 2) The County may require the employee to request the leave in writing at least 48 hours prior to the time of the desired leave; and
- 3) The County shall require written verification from the child's school that the employee was involved at the school during the leave time.

The County has chosen to go beyond the requirements of this statute and provide paid time without charge to vacation for up to eight hours per school year. To receive this paid time, the employee must match time off hour for hour with either vacation or leave without pay.

Section 25. Funeral Leave

Funeral leave may be used for death in the employee's immediate family (see Section 12 for definition of immediate family), but may not exceed three days for any one occurrence. Additional leave time required for such occurrence may be charged to vacation or other approved leave such as compensatory time when approved by the Department Head and/or County Manager. Documentation of the death in the immediate family may be required.

Section 26. Adverse Weather and Emergency Conditions Policy

The County has responsibility for providing emergency services. Adequate staff are required to operate these critical services seven days per week and 24 hours per day in all weather. Department Heads should designate which staff are in critical positions required to report to work regardless of weather or other hazardous conditions.

The adverse weather/hazardous conditions policy is established to be as fair as possible to all employees applying the following principles:

- a) maintain adequate staffing at all times of emergency services;
- b) provide for as much safety as possible for all employees in traveling to and from work in hazardous conditions; and
- c) not pay regular salaries to some employees for not working when others are required to be at work.

County offices and departments shall remain open for the full scheduled working day unless authorization for closing or other deviation is received from the County Manager's office. The County Manager will consider the hazard of driving conditions and other relevant factors in determining whether to close County offices. To the extent possible, all departments and offices will be given sufficient advance notice of any authorized closing of non-critical County functions. Employees who leave work before an official early closing time, as well as employees who report for work late or do not report for work because of hazardous conditions may use earned vacation or compensatory leave for days or hours not worked.

Critical staff are required to report in emergency situations and should make preparations for care of family and personal needs to allow them to report for duty when required. Any employee in a position designated as critical who does not report to work as directed by the County Manager or appropriate department head will be subject to disciplinary action.

Critical Staff Employees required to work during inclement weather closings will be given straight time off the number of hours equivalent to the announced early, delayed or whole day closing. Employees who do not work will be charged annual leave.

Examples: County Offices are closed due to inclement weather. Employee A is scheduled to work from 7:00 AM – 7:00 PM. Employee A will receive 7.5 hours of comp time.

Employee A does not come in to work at all on this day county offices are closed due to inclement weather. Employee A will be charged annual leave, comp leave or leave without pay.

ARTICLE VIII. SEPARATION AND REINSTATEMENT

Section 1. Types of Separations

All separations of employees from positions in the service of the County shall be designated as one of the following types and shall be accomplished in the manner indicated: Resignation, reduction in force, disability, voluntary retirement, dismissal, or death.

Section 2. Resignation

An employee may resign by submitting the reasons for resignation and the effective date in writing to the immediate supervisor as far in advance as possible. In all instances, the minimum notice requirement is a **two-week working notice**. Department Heads should provide a one month minimum notice. Failure to provide minimum notice shall result in forfeit of payment for accumulated annual leave unless the notice is waived upon recommendation of the Department Head, Human Resources Director, and approved by the County Manager.

Two consecutive days of absence without contacting the immediate supervisor or Department Head is considered to be a voluntary resignation.

Sick leave will only be approved during the final two weeks of a notice with a Certification of Health Care Provider form completed by the medical provider.

Section 3. Reduction in Force

In the event that a reduction in force becomes necessary, consideration shall be given to the quality of each employee's performance, organizational needs, and seniority in determining those employees to be retained. Employees who are separated because of a reduction in force shall be given at least two weeks notice of the anticipated action. No regular employee shall be separated while there are temporary, emergency or probationary employees serving in the same class in the department, unless the regular employee is not willing to transfer to the position held by the temporary or probationary employee.

To avoid a reduction in force, or in combination with a reduction in force, general temporary salary reductions of no more than 10% may be implemented.

Section 4. Disability

An employee who cannot perform the required duties because of a physical or mental impairment may be separated for disability. Action may be initiated by the employee or the County. In all cases, such action must be accompanied by medical evidence acceptable to the Department Head, Human Resources Director, and County Manager. The County may require an examination, at the County's expense, performed by a physician of the County's choice.

Section 5. Voluntary Retirement

An employee who meets the conditions set forth under the provision of the North Carolina Local Government Employee's Retirement System may elect to retire and receive all benefits earned under the retirement plan.

Section 6. Death

Separation shall be effective as of the date of death. All compensation due shall be paid to the estate of the employee.

Section 7. Dismissal

An employee may be dismissed in accordance with the provisions and procedures of Article IX.

Section 8. Reinstatement

An employee who is separated because of reduction in force may be reinstated within one year of the date of separation, upon recommendation of the supervisor and approval of the Human Resources Director and the County Manager. An employee who is reinstated in this manner shall be re-credited with his or her previously accrued sick leave and vacation accrual rate.

Section 9. Rehiring

An employee who resigns while in good standing may be rehired with the approval of the Hiring Authority, and shall be regarded as a new employee, subject to all of the provisions of rules and regulations of this Chapter. However, the employee may be credited with his or her previously accrued sick leave. An employee in good standing who is separated due to a reduction in force shall be given the first opportunity to be rehired in the same or a similar position.

ARTICLE IX. UNSATISFACTORY JOB PERFORMANCE AND DETRIMENTAL PERSONAL CONDUCT

Section 1. Disciplinary Action for Unsatisfactory Job Performance

A regular employee may be placed on disciplinary suspension (without pay), demoted, or dismissed for unsatisfactory job performance, if after following the procedure outlined below, the employee's job performance is still deemed to be unsatisfactory. All cases of disciplinary suspension, demotion, or dismissal must be approved by the Human Resources Director and the County Manager or hiring authority prior to giving final notice to the employee.

Section 2. Unsatisfactory Job Performance Defined

Unsatisfactory job performance includes any aspects of the employee's job which are not performed as required to meet the standards set by the supervisor. Examples of unsatisfactory job performance include, but are not limited to, the following:

- a) Demonstrated inefficiency, negligence, or incompetence in the performance of duties;
- b) Careless, negligent or improper use of County property or equipment;
- c) Physical or mental incapacity to perform duties;
- d) Discourteous treatment of the public or other employees or use of inappropriate or profane language;
- e) Absence without approved leave;
- f) Repeated improper use of leave privileges;
- g) Pattern of failure to report for duty at the assigned time and place;
- h) Failure to complete work within time frames established in work plan or work standards; or
- i) Failure to meet work standards over a period of time or to maintain required certifications.

Section 3. Communication and Warning Procedures Preceding Disciplinary Action for Unsatisfactory Job Performance

When an employee's job performance is unsatisfactory, or when incidents or inappropriate actions warrant, the supervisor should meet with the employee as soon as possible in one or more counseling sessions to discuss specific performance problems. A brief summary of these counseling sessions should be noted in the employee's file by the supervisor. An employee whose job performance is unsatisfactory over a period of time should normally receive at least two written warnings from the supervisor before disciplinary action resulting in dismissal is taken by the County Manager or Hiring Authority. In each case, the supervisor should record the dates of discussions with the employee, the performance deficiencies discussed, the corrective actions recommended, and the time limits set. If the employee's performance continues to be unsatisfactory, then the supervisor should use the following disciplinary steps:

- a) A final written warning from the supervisor serving notice upon the employee that corrected performance must take place immediately in order to avoid suspension, demotion, or dismissal.
- b) If performance does not improve, a written recommendation should be sent to the Department Head, Human Resources Director, and County Manager or Hiring Authority for disciplinary action such as suspension, demotion, or dismissal.

Suspensions should not normally exceed three days for nonexempt employees. For exempt employees, suspensions should normally be for one week to retain the exempt status of the employee.

Section 4. Disciplinary Action for Detrimental Personal Conduct

With the approval of the Department Head, Human Resources Director, and County Manager or Hiring Authority, an employee may be placed on disciplinary suspension (without pay), demoted, or dismissed without prior warning for causes relating to personal conduct detrimental to County service in order to a) avoid undue disruption of work; b) to protect the safety of persons or property; or c) for other serious reasons.

Disciplinary suspension should not normally exceed three days for nonexempt employees and should be one full week for exempt employees as prescribed by the FLSA.

Section 5. Detrimental Personal Conduct Defined

Detrimental personal conduct includes behavior of such a serious detrimental nature that the functioning of the County may be or has been impaired; the safety of persons or property may be or have been threatened; or the laws of the government may be or have been violated. Examples of detrimental personal conduct include, but are not limited to, the following:

- a) Fraud or theft;
- b) Commission of a felony or the entry of a plea of nolo contendere thereto;
- c) Falsification of records for personal profit, to grant special privileges, or to obtain employment;
- d) Willful misuse or gross negligence in the handling of County funds;
- e) Willful or wanton damage or destruction to property;
- f) Willful or wanton acts that endanger the lives and property of others;
- g) Possession of unauthorized firearms or other lethal weapons on the job;
- h) Brutality in the performance of duties;
- i) Reporting to work under the influence of alcohol or drugs or partaking of such while on duty. Prescribed medication may be taken within the limits set by a physician as long as medically necessary;
- j) Engaging in incompatible employment or servicing a conflicting interest;
- k) Request or acceptance of gifts in exchange for favors or influence;

- l) Engaging in political activity prohibited by this policy; or
- m) Stated refusal to perform assigned duties or flagrant violation of work rules and regulations.

Section 6. Pre-Dismissal Conference

Before dismissal action is taken, whether for detrimental personal conduct or unsatisfactory job performance, the County Manager or Hiring authority, the Human Resources Director or a Department Head will conduct a pre-dismissal conference. At this conference, the employee may present any response to the proposed dismissal to the County Manager or Hiring Authority, Human Resources Director or Department Head. The County Manager or Hiring Authority, Human Resources Director or Department Head will consider the employee's response, if any, to the proposed dismissal, and will, within three working days following the pre-dismissal conference, notify the employee in writing of the final decision. If the employee is dismissed, the notice shall contain a statement of the reason(s) for the action and the employee's appeal rights under the County's grievance procedure.

The Sheriff has authority to dismiss all employees in his or her respective department(s). Employees within these departments should consult with their departmental disciplinary procedure.

Section 7. Non-Disciplinary Suspension

During the investigation, hearing, or trial of an employee on any criminal charge, or during an investigation related to alleged detrimental personal conduct, or during the course of any civil action involving an employee, when suspension would, in the opinion of the supervisor, be in the best interest of the County, the Department Head, with the approval of the Human Resources Director and the County Manager or Hiring Authority, may suspend the employee for the duration of the proceedings as a non-disciplinary action. In such cases, the County may:

- a) Temporarily relieve the employee of all duties and responsibilities and place the employee on paid or unpaid leave for the duration of the suspension, or
- b) Assign the employee new duties and responsibilities and allow the employee to receive such compensation as is in keeping with the new duties and responsibilities.

If the employee is reinstated following the suspension such employee shall not lose any benefits to which otherwise employee would have been entitled had the suspension not occurred. If the employee is terminated following suspension, the employee shall not be eligible for any pay from the date of suspension; provided, however, all other benefits with the exception of accrued annual leave and sick leave shall be maintained during the period of suspension.

ARTICLE X. GRIEVANCE PROCEDURE AND ADVERSE ACTION APPEAL

Section 1. Policy

It is the policy of the County to provide a just and prompt procedure for the presentation, consideration, and disposition of employee grievances. The purpose of this article is to outline the procedure and to assure all employees that a response to their complaints and grievances will be prompt and fair.

Employees utilizing the grievance procedure shall not be subjected to retaliation or any form of harassment from supervisors or employees for exercising their rights under the grievance procedure. Supervisors or other employees who violate this policy shall be subject to disciplinary action up to and including dismissal.

Section 2. Grievance Defined

A grievance is a claim or complaint by an employee based upon an event or condition, which affects the circumstances under which an employee works, allegedly caused by misinterpretation, unfair application, or lack of established policy pertaining to employment conditions.

Former employees may appeal their termination from County employment within required time frames.

Section 3. Purposes of the Grievance Procedure

The purposes of the grievance procedure include, but are not limited to:

- 1) Providing employees with a procedure by which their complaints can be considered promptly, fairly, and without reprisal;
- 2) Encouraging employees to express themselves about the conditions of work which affect them as employees;
- 3) Promoting better understanding of policies, practices, and procedures which affect employees;
- 4) Increasing employees' confidence that personnel actions taken are in accordance with established, fair, and uniform policies and procedures; and
- 5) Increasing the sense of responsibility exercised by supervisors in dealing with their employees.
- 6) Encouraging conflicts to be resolved between employees and supervisors who must maintain an effective future working relationship, and therefore, encouraging conflicts to be resolved at the lowest level possible in the chain of command; and
- 7) Creating a work environment free of continuing conflicts, disagreements, and negative feelings about the County or its leaders, thus freeing up employee motivation, productivity, and creativity.

Section 4. Procedure

When an employee or group of employees has a grievance, the following successive steps are to be taken unless otherwise provided. The number of calendar days indicated for each step should be considered the maximum, unless otherwise provided, and every effort should be made to expedite the

process. However, the time limits set forth may be extended by mutual consent. The last step initiated by an employee shall be considered to be the step at which the grievance is resolved. A decision to rescind a disciplinary suspension, demotion or dismissal must be approved by the Hiring Authority before the decision becomes effective.

Informal Resolution. Prior to the submission of a formal grievance, the employee and supervisor should meet to discuss the problem and seek to resolve it informally. Either the employee or the supervisor may involve the Human Resources Office as a resource to help resolve the grievance. Mediation may be used at any step in the process and is encouraged. Mediation is the neutral facilitation of the conflict between or among parties where the facilitator helps the parties find a mutually agreeable outcome.

Step 1. If no resolution to the grievance is reached informally, the employee who wishes to pursue a grievance shall present the grievance to the supervisor in writing. The grievance must be presented within fifteen calendar days of the event or within fifteen calendar days of learning of the event or condition. The supervisor shall respond to the grievance within five work days after receipt of the grievance. The supervisor should, and is encouraged to, consult with any employee of the County in order to reach a correct, impartial, fair and equitable determination or decision concerning the grievance. Any employee consulted by the supervisor is required to cooperate to the fullest extent possible.

The response from each supervisory level for each step in the formal grievance process shall be in writing and signed and dated by the supervisor. In addition, the employee shall sign a copy to acknowledge receipt thereof. The responder at each step shall send copies of the grievance and response to the Human Resources Director.

Step 2. If the grievance is not resolved to the satisfaction of the employee by the supervisor, the employee may appeal, in writing, to the Department Head within five work days after receipt of the response from Step 1. The Department Head shall respond to the appeal, stating the determination of decision within five work days after receipt of the appeal.

Step 3. (For general County employees only) If the grievance is not resolved to the satisfaction of the employee by the Department Head, the employee may appeal, in writing, to the County Manager or Hiring Authority within five work days after receipt of the response from Step 2. The Hiring Authority shall respond to the appeal, may meet with the employee to discuss the grievance fully, and will make a decision within ten calendar days of receiving the written grievance. The Hiring Authority's decision is final. However the County Manager should inform the County Board of Commissioners of any possible legal actions. Any appeal of this decision must be made through the North Carolina Court System.

Special Note: The Sheriff and Register of Deeds, will carry out the responsibilities designated as the County Manager in their respective departments.

Step 3. (For employees only in the Social Services Department) If the grievance is not resolved to the satisfaction of the employee by the Department Head, the employee may appeal the decision to the North Carolina Office of Administrative Hearings (OAH) within thirty calendar days of the receipt of the Department Head's decision. The findings of the OAH will be forwarded to the State Personnel Commission. The decision of the State Personnel Commission shall be advisory only and the Department Head shall have the final decision. Discrimination cases may be appealed directly to the OAH.

Department Heads. In the case of department heads or other employees where the Hiring Authority has been significantly involved in determining disciplinary action, including dismissal, the Hiring Authority may wish to obtain a neutral outside party to either:

- a) provide mediation between the grieving department head and the Hiring Authority (see definition of mediation in informal resolution above); or
- b) consider the appeal and make recommendations back to the Hiring Authority concerning the appeal. Such parties might consist of human resource professionals, attorneys, mediators, or other parties appropriate to the situation.

Department heads may also request the application of these special provisions.

The Hiring Authority's decision regarding the disposition of the grievance shall be the final decision. The County Manager would notify the Board of Commissioners of any impending legal action.

Section 5. Role of the Human Resources Director

Throughout the grievance procedure, the roles of the Human Resources Director shall be as follows:

- a) To advise parties (including employee, supervisors, and County Manager) of their rights and responsibilities under this policy, including interpreting the grievance and other policies for consistency of application;
- b) To be a clearinghouse for information and decisions in the matter including maintaining files of all grievance documents.
- c) To give notices to parties concerning timetables of the process, etc.;
- d) To assist employees and supervisors in drafting statements; and
- e) To facilitate the resolution of conflicts in the procedures or of the grievance at any step in the process; and
- f) To help locate mediation or other resources as needed.

The Human Resources Director shall also determine whether or not additional time shall be allowed to either side in unusual circumstances if the parties cannot agree upon extensions when needed or indicated.

Section 6. Grievance and Adverse Action Appeal Procedure for Discrimination

When an employee, former employee, or applicant believes that any employment action discriminates illegally (i.e. is based on age, sex, sexual orientation, race, color, national origin, religion, creed, political affiliation, or disability) he or she has the right to appeal such action using the grievance procedure outlined in this policy. While such persons are encouraged to use the grievance procedure, they shall have the right to appeal directly to the Human Resources Director and the County Manager. An employee or applicant should appeal an alleged act of discrimination within thirty calendar days of the alleged discriminatory action, but may appeal for up to six months following the action.

ARTICLE XI. PERSONNEL RECORDS AND REPORTS

Section 1. Public Information

In compliance with GS 153A-98, Employees information will be a public record. The following information with respect to each County employee is currently a matter of public record: name; age; date of original employment or appointment to the service; current position title; current salary; and the office to which the employee is currently assigned. Effective October 1, 2010, the Public Records Law was updated to include the date and amount of each increase or decrease in salary; date and type of each promotion, demotion, transfer, suspension, separation, or other change in position classification; the date and general descriptions of the reasons for each promotion; the date and type of each dismissal, suspension, or demotion for disciplinary reasons taken; for dismissals due to disciplinary reasons, a copy of the written notice of the final decision of the county setting forth the specific acts or omissions that are the basis of the dismissal. Any person may have access to this information for the purpose of inspection, examination, and copying, during regular business hours, subject only to such rules and regulations for the safekeeping of public records as the County may adopt.

Section 2. Access to Confidential Records

All information contained in a County employee's personnel file, other than the information mentioned above is confidential and shall be open to inspection only in the following instances:

- a) The employee or his/her duly authorized agent may examine all portions of his/her personnel file except letters of reference solicited prior to employment, and information concerning a medical disability, mental or physical, that a prudent physician would not divulge to the patient.
- b) A licensed physician designated in writing by the employee may examine the employee's medical record.
- c) A County employee having supervisory authority over the employee may examine all material in the employee's personnel file.
- d) By order of a court of competent jurisdiction, any person may examine all material in the employee's personnel file.
- e) An official of an agency of the State or Federal Government, or any political subdivision of the State, may inspect any portion of a personnel file when such inspection is deemed by the County Manager to be necessary and essential to the pursuit of a proper function of the inspecting agency, but no information shall be divulged for the purpose of assisting in a criminal prosecution of the employee, or for the purpose of assisting in an investigation of the employee's tax liability.

However, the official having custody of the personnel records may release the name, address, and telephone number from a personnel file for the purpose of assisting in a criminal investigation.

- f) An employee may sign a written release to be placed in his/her personnel file that permits the record custodian to provide, either in person, by telephone, or by mail, information specified in the release to prospective employers, educational institutions, or other persons specified in the release.

- g) The County Manager, with the concurrence of the County Board of Commissioners, may inform any person of the employment, non-employment, promotion, demotion, suspension or other disciplinary action, reinstatement, transfer, or termination of a County employee, and the reasons for that action. Before releasing that information, the County Manager shall determine that the release is essential to maintaining the level and quality of County services. The written determination shall be retained in the County Manager's office, is a record for public inspection, and shall become a part of the employee's personnel file.

Section 3. Personnel Actions

The Human Resources Director, with the approval of the County Manager, will prescribe necessary forms and reports for all personnel actions and will retain records necessary for the proper administration of the personnel system. The official personnel files are those which are maintained by the Human Resources Office. These files shall contain documents such as employment applications and related materials, records of personnel actions, documentation of employee warnings, disciplinary actions, performance evaluations, retirement and insurance records, letters of recommendation, and other personnel-related documents. Any documents not contained in these files or maintained as designated by the Human Resources Director are not an official part of the personnel file.

Section 4. Records of Former Employees

The provisions for access to records apply to former employees as they apply to present employees.

Section 5. Remedies of Employees Objecting to Material in File

An employee who objects to material in his/her file may place a statement in the file relating to the material considered to be inaccurate or misleading. The employee may seek removal of such material in accordance with established grievance procedures.

Section 6. Penalties for Permitting Access to Confidential Records

Section 153A-98 of the General Statutes provides that any public official or employee who knowingly and willfully permits any person to have access to any confidential information contained in an employee personnel file, except as expressly authorized by the designated custodian, is guilty of a misdemeanor and upon conviction shall be fined in an amount consistent with the General Statutes.

Section 7. Examining and/or Copying Confidential Material without Authorization

Section 153A-98 of the General Statutes of North Carolina provides that any person, not specifically authorized to have access to a personnel file designated as confidential, who shall knowingly and willfully examine in its official filing place, remove or copy any portion of a confidential personnel file shall be guilty of a misdemeanor and upon conviction shall be fined consistent with the General Statutes.

Section 8. Destruction of Records Regulated

No public official may destroy, sell, loan, or otherwise dispose of any public record, except in accordance with GS 121.5 (b), without the consent of the State Department of Cultural Resources. Whoever unlawfully removes a public record from the office where it is usually kept, or whoever, alters, defaces, mutilates or destroys it will be guilty of a misdemeanor and upon conviction will be fined in an amount provided in Chapter 132.3 of the General Statutes.

ARTICLE XII. IMPLEMENTATION OF POLICIES

Section 1. Conflicting Policies Repealed

All policies, ordinances, or resolutions that conflict with the provisions of these policies are hereby repealed.

Section 2. Separability

If any provision of these policies or any rule, regulation, or order thereunder of the application of such provision to any person or circumstances is held invalid, the remainder of these policies and the application of such remaining provisions of these policies of such rules, regulations, or orders to persons or circumstances other than those held invalid will not be affected thereby.

Section 3. Effective Date

These policies shall become effective on a date approved by the County Board of Commissioners.

Section 4. Amendments

This policy may be amended by action of the Board of Commissioners and by resolution appropriately approved. Notice of any suggested amendment to the policy or any portion thereof, shall be provided to employees and opportunities for employee comment and reaction shall be made available prior to the amendments going to the Commissioners for action. Any revisions or amendments adopted in conformance with this procedure shall become effective as of the date of such adoption or a date approved by the Board of Commissioners.

GLOSSARY

<u>Acronym</u>	<u>Acronym Definition</u>
FLSA	Fair Labor Standards Act
FMLA	Family Medical Leave Act
G. S.	General Statutes
LGERS	Local Government Employees' Retirement System
NC OAH	North Carolina Office of Administrative Hearings
NC OSHR	North Carolina Office of State Human Resources
USERRA	The Uniformed Services Employment and Reemployment Rights Act

W Bullock – W. Bullock Firearms Quals

CRIMINAL JUSTICE EDUCATION AND TRAINING STANDARDS COMMISSION
NORTH CAROLINA SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

Sheriffs' Standards Division
PO Box 629
Raleigh, NC 27602
Telephone: (919) 779-8213
Fax: (919) 662-4515



Criminal Justice Standards Division
Post Office Drawer 149
Raleigh, NC 27602
Telephone: (919) 661-5980
Fax: (919) 779-8210

FIREARMS QUALIFICATION RECORD INSTRUCTIONS

Form F-9A (rev. 01.18)

This form must be utilized to record the annual In-Service Firearms Training and Qualification for each certified officer in compliance with 12 NCAC 9E .0100 or 12 NCAC 10B .2104. A copy must be maintained in each officer's personnel file at the employing agency, and must be available for inspection by a Commission Staff member. A copy must be attached to the F-5A and submitted to the Criminal Justice Standards Division for all new hires.

SECTION I: Must be completed for every officer.
SECTION II: Must be completed for every officer and signed and dated by the instructor(s).
SECTION III: Must be signed and dated by the officer.
SECTION IV: Must be signed and dated by the Agency Head or designated representative.
SECTION V: Must be completed and signed by the specific certified Specialized Firearms Instructor(s).

I. OFFICER'S NAME: Weldon Bullock SSN (Last 4): [REDACTED]

Certified by: NC Criminal Justice Education and Training Standards Commission: ☐ Yes ☒ No
Certified by: NC Sheriffs' Education and Training Standards Commission: ☒ Yes ☐ No

EMPLOYING/APPOINTING AGENCY: Vance County Sheriff's Office

II. FIREARMS INSTRUCTOR COMPLIANCE – CLASSROOM REQUIREMENT

As a Specialized Firearms Instructor, I do hereby certify that the officer listed above has completed the mandatory classroom portion of the in-service firearms training, as specified in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable. Failure to complete this training requires that the agency head or designated representative be notified.

The classroom session was completed on: 09/06/2018 (date).
William T. Bartholomew W. Bullock 100061046 9-6-18
Print Name of Firearms Instructor Signature of Firearms Instructor Instructor # Date Signed

III. ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

I do hereby certify that I have been advised of my firearms qualification scores by the Specialized Firearms Instructor(s) indicated. I also understand that if I have failed to qualify with any weapons(s) required, I may not carry and/or have access to the weapon until such time as I have qualified. I further understand that I must notify my agency head or designated representative within 24 hours of my failure to qualify, and/or successfully complete the training portion as prescribed in 12 NCAC .9E .0105 or 12 NCAC 10B .2103 as applicable.

W. Bullock 09/06/2018
Signature of Officer Date Signed

IV. AGENCY ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

As agency head, or designated representative, the below signature acknowledges receipt of the above officer's qualification scores and attests that the above officer has satisfactorily completed training on this department's policies regarding the use of force, N.C. State law regarding the use of deadly force, relevant case law, and safety and marksmanship as required in 12 NCAC 9E .0105 or 12 NCAC 10B .2103. I understand that if the officer has failed to qualify with any weapon(s), then I must restrict access to all applicable weapon(s) until such time as the officer has qualified with same.

☒ I certify that the in-service firearms training consisted of a minimum of four (4) hours/credits (For Criminal Justice Commission only.)

[Signature] 9-17-18
Signature of Agency Head/Designated Representative Date Signed

****As a certified Specialized Firearms Instructor, I hereby certify that the officer listed below has attained the score(s) as documented below. I understand that if the officer has failed to qualify, then I must deliver a copy of this form to the officer's agency head or designated representative within 72 hours either in person, or by certified mail. ****

F-9A (rev. 01.18)

NAME OR RANGE LOCATION: HPD Training Center

OFFICER'S NAME: Weldon Bullock

V. SERVICE HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
1. 9/6/18	SA	SIG	P220	45CAL	G300658	230gr	D	P	YOS	W.T. Bartholomew / 103 / 100061046
2. 9/6/18	SA	SIG	P220	45CAL	G300658	230gr	N	P	YOS	W.T. Bartholomew / 103 / 100061046
3.										
4.										

OFF-DUTY HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
1. 9/6/18	SA	KAHR	CW9	9MM	YB9149	147GR	D	P	YOS	W.T. Bartholomew / 103 / 100061046
2. 9/6/18	SA	KAHR	CW9	9MM	YB9149	147GR	N	P	YOS	W.T. Bartholomew / 103 / 100061046
3.										
4.										

SHOTGUN/RIFLE QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
1. 9/6/18	SG	REM	870	12GA	A8776411M	00BUCK/SLUG	D	P	YOS	W.T. Bartholomew / 103 / 100061046
2. 9/6/18	SG	REM	870	12GA	A8776411M	00BUCK/SLUG	N	P	YOS	W.T. Bartholomew / 103 / 100061046

AUTOMATIC/SPECIALTY WEAPONS/OTHER

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
1.										
2.										

COMBAT COURSE

Date	Day/Night	Pass/Fail	Comments	Print and Sign Name & Instructor Number
1. 9/6/18	DAY	Pass	Shot on the range / Situational Shooty / 100% Shooty / 103 / 100061046	W.T. Bartholomew / 103 / 100061046
2. 9/6/18	NIGHT	Pass	Shot on the range / Situational Shooty / 100% Shooty / 103 / 100061046	W.T. Bartholomew / 103 / 100061046

R-Revolver
SA-Semi Auto Handgun
SG- Shotgun
AW-Automatic Weapon
RF-Rifle
S&W-Smith & Wesson
GLO-Glock
BER-Beretta
RUG-Ruger
SIG-Sig Sauer
BEN-Benelli
CLT-Colt
WIN-Winchester
ARA-Armalite
SAV-Savage
BRO-Browning
H&K-Heckler & Koch
MOS-Mossberg
REM-Remington
BUS-Bushmaster
SW-Specialized Weapon
-SPF-Springfield
RRV-Rock River
Ammunition- Must be dry ammunition or ballistic equivalent ammunition.
Include sufficient information to fully describe such as caliber, projectile weight and type.
*Shr - * Standards handgun night requires use of flashlight at the 3-5yd line
**Shr - Standards accepts pass/fail rather than % scores

CRIMINAL JUSTICE EDUCATION AND TRAINING STANDARDS COMMISSION
NORTH CAROLINA SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

Sheriffs' Standards Division
PO Box 629
Raleigh, NC 27602
Telephone: (919) 779-8213
Fax: (919) 662-4515



Criminal Justice Standards Division
Post Office Drawer 149
Raleigh, NC 27602
Telephone: (919) 661-5980
Fax: (919) 779-8210

FIREARMS QUALIFICATION RECORD INSTRUCTIONS

Form F-9A (rev. 01.18)

This form must be utilized to record the annual In-Service Firearms Training and Qualification for each certified officer in compliance with 12 NCAC 9E .0100 or 12 NCAC 10B .2104. A copy must be maintained in each officer's personnel file at the employing agency, and must be available for inspection by a Commission Staff member. A copy must be attached to the F-5A and submitted to the Criminal Justice Standards Division for all new hires.

SECTION I: Must be completed for every officer.
SECTION II: Must be completed for every officer and signed and dated by the instructor(s).
SECTION III: Must be signed and dated by the officer.
SECTION IV: Must be signed and dated by the Agency Head or designated representative.
SECTION V: Must be completed and signed by the specific certified Specialized Firearms Instructor(s).

I. OFFICER'S NAME: Weldon W. Bullock SSN (Last 4): [REDACTED]

Certified by: NC Criminal Justice Education and Training Standards Commission: ☐ Yes ☒ No
Certified by: NC Sheriffs' Education and Training Standards Commission: ☒ Yes ☐ No

EMPLOYING/APPOINTING AGENCY: Vance Co Sheriffs Office

II. FIREARMS INSTRUCTOR COMPLIANCE - CLASSROOM REQUIREMENT

As a Specialized Firearms Instructor, I do hereby certify that the officer listed above has completed the mandatory classroom portion of the in-service firearms training, as specified in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable. Failure to complete this training requires that the agency head or designated representative be notified.

The classroom session was completed on 2/4/19 (date)
WTP Bartholomew WTP Bartholomew 100061046 2/4/19
Print Name of Firearms Instructor Signature of Firearms Instructor Instructor # Date Signed

III. ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

I do hereby certify that I have been advised of my firearms qualification scores by the Specialized Firearms Instructor(s) indicated. I also understand that if I have failed to qualify with any weapons(s) required, I may not carry and/or have access to the weapon until such time as I have qualified. I further understand that I must notify my agency head or designated representative within 24 hours of my failure to qualify, and/or successfully complete the training portion as prescribed in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable.

W. Bullock
Signature of Officer

2/4/19
Date Signed

IV. AGENCY ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

As agency head, or designated representative, the below signature acknowledges receipt of the above officer's qualification scores and attests that the above officer has satisfactorily completed training on this department's policies regarding the use of force, N.C. State law regarding the use of deadly force, relevant case law, and safety and marksmanship as required in 12 NCAC 9E .0105 or 12 NCAC 10B .2103. I understand that if the officer has failed to qualify with any weapon(s), then I must restrict access to all applicable weapon(s) until such time as the officer has qualified with same.

☒ I certify that the in-service firearms training consisted of a minimum of four (4) hours/credits (For Criminal Justice Commission only.)

Sherrill Ant R. Brance
Signature of Agency Head/Designated Representative

2/5/19
Date Signed

**As a certified Specialized Firearms Instructor, I hereby certify that the officer listed below has attained the score(s) as documented below. I understand that if the officer has failed to qualify, then I must deliver a copy of this form to the officer's agency head or designated representative within 72 hours either in person, or by certified mail. **

OFFICER'S NAME: W. W. Bullock NAME OR RANGE LOCATION: H P A TC F-9A (rev. 01.18)

V. SERVICE HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
1.										
2.										
3.										
4.										

OFF-DUTY HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
1. 2/24/19	SA	SCCY	CPX-2	9mm	213612		D	P	YES	W. J. Bartholomew / 100061046
2. 2/24/19	SA	SCCY	CPX-2	9mm	213612		N	P	YES	W. J. Bartholomew / 100061046
3.										
4.										

SHOTGUN/RIFLE QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
1.										
2.										

AUTOMATIC/SPECIALTY WEAPONS/OTHER

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
1.										
2.										

COMBAT COURSE

Date	Day/Night	Pass/Fail	Comments	Print and Sign Name & Instructor Number
1. 2/24/19	Day	Pass	Short on the mark / Situational Shooting	W. J. Bartholomew / 100061046
2. 2/24/19	Night	Pass	" "	W. J. Bartholomew / 100061046

R-Revolver
SA- Semi Auto Handgun
SG- Shotgun
AW- Automatic Weapon
RF- Rifle
S&W- Smith & Wesson
GLO- Glock
BER- Beretta
RUG- Ruger
SIG- Sig Sauer
BEN- Benelli
CLT- Colt
WIN- Winchester
ARA- ArmaLite
SAV- Savage
BRO- Browning
H&K- Heckler & Koch
MOS- Mossberg
REM- Remington
BUS- Bushmaster
SW- Specialized Weapon
SPF- Springfield
RRV- Rock River
Ammunition- Must be duty ammunition or ballistic equivalent ammunition.
Include sufficient information to fully describe such as caliber, projectile weight and type.
*Sheriff's Standards handgun night requires use of flashlight at the 5-yd line
*Sheriff's Standards accepts pass/fail rather than 1/4 scores

CRIMINAL JUSTICE EDUCATION AND TRAINING STANDARDS COMMISSION
NORTH CAROLINA SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

Sheriffs' Standards Division
PO Box 629
Raleigh, NC 27602
Telephone: (919) 779-8213
Fax: (919) 662-4515



Criminal Justice Standards Division
Post Office Drawer 149
Raleigh, NC 27602
Telephone: (919) 661-5980
Fax: (919) 779-8210

FIREARMS QUALIFICATION RECORD INSTRUCTIONS

Form F-9A (rev. 01.18)

This form must be utilized to record the annual In-Service Firearms Training and Qualification for each certified officer in compliance with 12 NCAC 9E .0100 or 12 NCAC 10B .2104. A copy must be maintained in each officer's personnel file at the employing agency, and must be available for inspection by a Commission Staff member. A copy must be attached to the F-5A and submitted to the Criminal Justice Standards Division for all new hires.

SECTION I: Must be completed for every officer.
SECTION II: Must be completed for every officer and signed and dated by the instructor(s).
SECTION III: Must be signed and dated by the officer.
SECTION IV: Must be signed and dated by the Agency Head or designated representative.
SECTION V: Must be completed and signed by the specific certified Specialized Firearms Instructor(s).

I. OFFICER'S NAME: Weldon Bullock SSN (Last 4): XXX-XX-XXXX

Certified by: NC Criminal Justice Education and Training Standards Commission:
Certified by: NC Sheriffs' Education and Training Standards Commission:

☐ Yes ☐ No
☒ Yes ☐ No

EMPLOYING/APPOINTING AGENCY: Vance Co. Sheriff's Office

II. FIREARMS INSTRUCTOR COMPLIANCE - CLASSROOM REQUIREMENT

As a Specialized Firearms Instructor, I do hereby certify that the officer listed above has completed the mandatory classroom portion of the in-service firearms training, as specified in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable. Failure to complete this training requires that the agency head or designated representative be notified.

The classroom session was completed on: 12/22/19 (date)

William Taylor Bartholomew W. Bullock 100061046 12/22/19
Print Name of Firearms Instructor Signature of Firearms Instructor Instructor # Date Signed

III. ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

I do hereby certify that I have been advised of my firearms qualification scores by the Specialized Firearms Instructor(s) indicated. I also understand that if I have failed to qualify with any weapons(s) required, I may not carry and/or have access to the weapon until such time as I have qualified. I further understand that I must notify my agency head or designated representative within 24 hours of my failure to qualify, and/or successfully complete the training portion as prescribed in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable.

W. Bullock, J.
Signature of Officer

12/22/19
Date Signed

IV. AGENCY ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

As agency head, or designated representative, the below signature acknowledges receipt of the above officer's qualification scores and attests that the above officer has satisfactorily completed training on this department's policies regarding the use of force, N.C. State law regarding the use of deadly force, relevant case law, and safety and marksmanship as required in 12 NCAC 9E .0105 or 12 NCAC 10B .2103. I understand that if the officer has failed to qualify with any weapon(s), then I must restrict access to all applicable weapon(s) until such time as the officer has qualified with same.

☒ I certify that the in-service firearms training consisted of a minimum of four (4) hours/credits (For Criminal Justice Commission only.)

Curtis R. Brame
Signature of Agency Head/Designated Representative

Date Signed

**As a certified Specialized Firearms Instructor, I hereby certify that the officer listed below has attained the score(s) as documented below. I understand that if the officer has failed to qualify, then I must deliver a copy of this form to the officer's agency head or designated representative within 72 hours either in person, or by certified mail. **

OFFICER'S NAME: Weldon Bullock NAME OR RANGE LOCATION: Henderson F-9A (rev. 01.18)

V. SERVICE HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
12-22	SA	Sig	P220	45 ACP	G300658	230grm	P	P	Yes	WJ Bathehand / 103 / 100061046
12-22	SA	Sig	P220	45 ACP	G300658	230grm	N	P	Yes	WJ Bathehand / 103 / 100061046

OFF-DUTY HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number
12-22	SA	Kahr	Qw9	9mm	VB9149	147grm	D	P	Yes	WJ Bathehand / 103 / 100061046
12-22	SA	Kahr	Qw9	9mm	VB9149	147grm	N	P	Yes	WJ Bathehand / 103 / 100061046

SHOTGUN/RIFLE QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number

AUTOMATIC/SPECIALTY WEAPONS/OTHER

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Qualify Yes/No	Print and Sign Name & Instructor Number

COMBAT COURSE

Date	Day/Night	Pass/Fail	Comments	Print and Sign Name & Instructor Number
12/22/19	Day	Pass	Shoot on Mark / 500m / 500m / 500m / 500m	WJ Bathehand / 103 / 100061046
12/22/19	Night	Pass	Shoot on Mark / 500m / 500m / 500m / 500m	WJ Bathehand / 103 / 100061046

R-Revolver
SA-Semi Auto Handgun
SG- Shotgun
AW- Automatic Weapon
RF- Rifle
SW- Specialized Weapon
SPT - Springfield
RRV - Rock River
BRO - Browning
H&K - Heckler & Koch
MOS - Mosberg
REM - Remington
BUS - Bushmaster
SAV - Savage
BEN - Benelli
CLT - Colt
WIN - Winchester
ARA - Armalite
SIG - Sig Sauer

Ammunition: Must be duty ammunition or ballistic equivalent ammunition.
Include sufficient information to fully describe such as caliber, projectile weight and type.
*Sheriff's Standards handgun night requires use of flashlight at the 5-yd line
*Sheriff's Standards accepts pass/fail rather than % scores

W Bullock – W. Bullock Signed Force Policy

TITLE: USE OF DEADLY FORCE - HANDOUT

NORTH CAROLINA GENERAL STATUTE 15A-401 (d) (2) - USE OF FORCE IN ARREST.

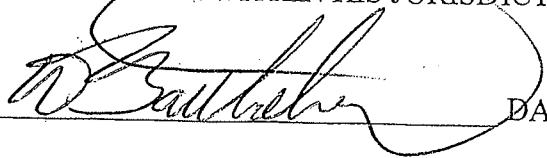
A LAW ENFORCEMENT OFFICER IS JUSTIFIED IN USING DEADLY PHYSICAL FORCE UPON ANOTHER PERSON FOR A PURPOSE SPECIFIED IN SUBDIVISION (1) OF THIS SUBSECTION ONLY WHEN IT IS OR APPEARS TO REASONABLY NECESSARY THEREBY:

- A) TO DEFEND HIMSELF OR A THIRD PERSON FROM WHAT HE REASONABLY BELIEVES TO THE USE IMMINENT USE OF DEADLY PHYSICAL FORCE;
- B) TO EFFECT AN ARREST OR PREVENT THE ESCAPE FROM THE CUSTODY OF A PERSON WHO HE REASONABLY BELIEVES IS ATTEMPTING TO ESCAPE BY MEANS OF A DEADLY WEAPON, OR WHO BY HIS CONDUCT OR ANY OTHER MEANS INDICATES THAT HE PRESENTS AN IMMINENT THREAT OF DEATH OR SERIOUS PHYSICAL INJURY TO OTHERS UNLESS APPREHENDED WITHOUT DELAY; OR
- C) TO PREVENT THE ESCAPE OF A PERSON FROM CUSTODY IMPOSED UPON HIM AS A RESULT OF CONVICTION FOR A FELONY.

NOTHING IN THIS SUBDIVISION CONSTITUTES JUSTIFICATION FOR WILLFUL, MALICIOUS OR CRIMINAL NEGLIGENT CONDUCT ANY PERSON WHICH INJURES OR ENDANGERS ANY PERSON OR PROPERTY, NOR SHALL IT BE CONSTRUED TO EXCUSE OR JUSTIFY THE USE OF UNREASONABLE OR EXCESSIVE FORCE.

NOTE: A LAW ENFORCEMENT OFFICER ACTING OUTSIDE OF HIS/HER JURISDICTION ASSUMES THE IDENTITY OF A PRIVATE CITIZEN. WHILE THERE MAY BE JUSTIFICATION FOR THE INDIVIDUAL'S ACTION WHEN CONFRONTED WITH A CRIMINAL SITUATION, THE OFFICER IS STILL CIVILLY LIABLE. IT IS IMPORTANT TO NOTE THAT A CIVIL JURY MAY VIEW THIS ACTIONS AS A CITIZEN ALTOGETHER DIFFERENTLY THAN IF WERE ACTING AS A SWORN OFFICER WITHIN HIS JURISDICTIONAL LIMITS.

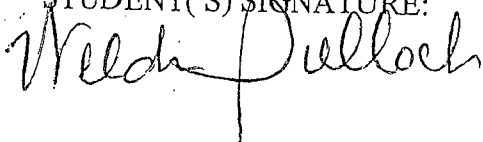
INSTRUCTOR:



DATE:

9-6-18

STUDENT(S) SIGNATURE:



Approved Directive B.9, eff 9-1-09

Dept. Policy on Use of Force

9-6-18

Justin J. White
6606 Clarksburg Place
Mailbox 12
Raleigh, NC 27616

May 22nd, 2017

To Whom it May Concern:

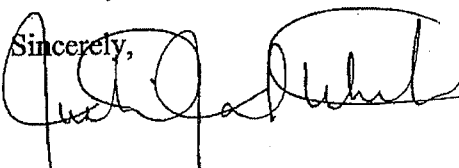
Re: Bertie Correctional Institution Termination

Good morning,

Per my interview on May 10th, 2017, I was instructed to provide a notarized statement pursuant to my dismissal from the NC Department of Public Safety: Bertie Correctional Institution.

On July 24th, 2015, I was terminated from Bertie Correctional Institution for allegations of Insubordination, categorized as unacceptable personal conduct as noted on my F-3 Personal History Statement. I filed an appeal and on September 11th, 2015, I was reinstated with back pay and full benefits. Same day, after my reinstatement, I submitted my resignation. Since the termination was overturned by upper management, then no termination exists.

Should you have any further questions or concerns please do not hesitate in contacting me.

Sincerely,
 5/30/2017

Justin White
Jw

Cc: File
Justin White, Applicant
W.W. Bullock, Captain, Vance County Sheriff's Office

State of North Carolina
County of Wake

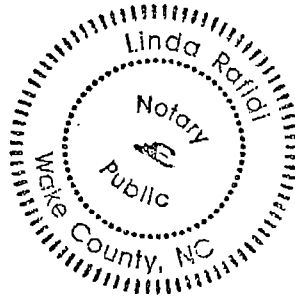
On this, the 30th day of May, 2017, before me a notary public, the undersigned party, personally appeared Justin James White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto set my hand and official seal.

Linda Rafal

Notary Public

My Commission expires on
March 14, 2019



W Bullock – White Letters re Previous Employment

Justin J. White
6606 Clarksburg Place
Mailbox 12
Raleigh, NC 27616

May 22nd, 2017

To Whom it May Concern

Re: Louisburg College Termination

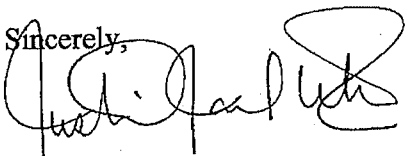
Good morning,

Per my interview on May 10th, 2017, I was instructed to provide a notarized statement pursuant to my dismissal from Louisburg College, Campus Police and Safety Department. I served in the capacity of campus safety officer pending law enforcement certification.

On January 5th, 2017, I was terminated from the aforementioned pursuant to the employee probationary policy. Management felt I was not a good fit and ended the business relationship and wished me the best in my endeavors.

Should you have any further questions or concerns please do not hesitate in contacting me.

Sincerely,

 5/30/2017

Justin White
Jw

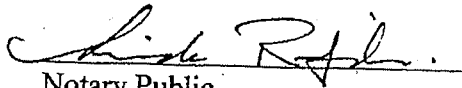
Enclosures: (1)
Copy of the Dismissal Letter

Cc: File
Justin White, Applicant
W.W. Bullock, Captain, Vance County Sheriffs Office

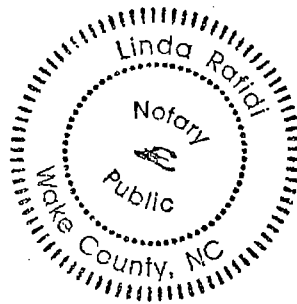
State of North Carolina
County of Wake

On this, the 30th day of May, 2017, before me a notary public, the undersigned party, personally appeared Justin James White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto set my hand and official seal.


Notary Public

My Commission expires on
March 14, 2019



Justin J. White
6606 Clarksburg Place
Mailbox 12
Raleigh, NC 27616

May 22nd, 2017

To Whom it May Concern

Re: Shaw University Termination

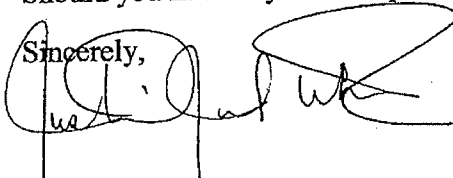
Good morning,

Per my interview on May 10th, 2017, I was instructed to provide a notarized statement pursuant to my dismissal from Shaw University, Campus Police and Security Department. I held the position of campus security officer pending law enforcement certification.

On February 20th, 2017, I was terminated from the above-mentioned. Per human resources, I was discharged under the 6 month probationary period policy. No reason was listed on the dismissal notice. An internal appeal has been filed and such is being weighed by management for final determination.

Should you have any further questions or concerns please do not hesitate in contacting me.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin White", with a date "5/30/2017" written to its right.

Justin White
Jw

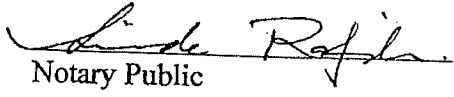
Enclosure: (1)
Copy of Dismissal Letter

Cc: File
Justin White, Applicant
W.W. Bullock, Captain, Vance County Sheriff's Office

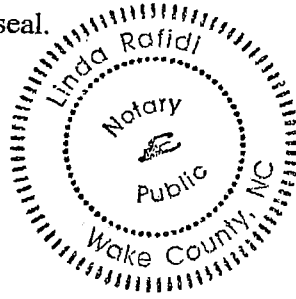
State of North Carolina
County of Wake

On this, the 30th day of May, 2017, before me a notary public, the undersigned party, personally appeared Justin Jemel White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto set my hand and official seal.


Notary Public

My Commission expires on
March 14, 2019



W Bullock – White VCSO Application

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



PLEASE ATTACH A PHOTOGRAPH Sheriff Peter White DATE 3/4/2017

APPLICATION FOR DEPUTY POSITION

PLEASE PRINT AND ANSWER ALL QUESTIONS

POSITION APPLIED FOR: Deputy Sheriff

FULL-TIME OR PART-TIME? Full time

NAME IN FULL: Justin Jamel White

PRESENT ADDRESS: 6606 Clarksburg Place - Mailbox 12 (27616)

CITY: Rahrig STATE: NC

HOME PHONE: Home: 252-356-2467 WORK PHONE: N/A

HOW LONG HAVE YOU LIVED THERE? 1 1/2 months approximately

PREVIOUS ADDRESS IF LESS THAN 1 YEAR AT ABOVE ADDRESS: 643 Hwy 45 North - P.O. Box 82
Memory Hill NC 27257

SOCIAL SECURITY NUMBER: - - - 6961 DATE OF BIRTH: 08 / 15 / 1989

DRIVER'S LICENSE NUMBER & STATE: NC DL 30643245

HEIGHT: 5 FT. 8 IN. WEIGHT: 245 ANY PHYSICAL DEFECTS? YES NO ✓

IF YES TO PHYSICAL DEFECTS, DESCRIBE: N/A

HAVE YOU EVER BEEN EMPLOYED BY VANCE COUNTY? YES NO ✓

IF YES, WHAT DEPARTMENT AND WHEN EMPLOYED? N/A

PAGE 2 APPLICATION FOR EMPLOYMENT

NUMBER OF DAYS LOST TO ILLNESS DURING THE PAST TWO YEARS: N/A

IF MORE THAN 14 DAYS, WHAT WAS THE ILLNESS? N/A

HOW WOULD YOU DESCRIBE THE PRESENT CONDITION OF YOUR HEALTH? (CIRCLE BELOW)

EXCELLENT

GOOD

FAIR

POOR

EDUCATION - HIGHEST GRADE COMPLETED Graduate School: Master's Degree

HIGH SCHOOL ATTENDED: Perquimans High School

DID YOU GRADUATE? Yes YEAR GRADUATED: 2007

COLLEGE ATTENDED: University of Mount Olive, NC

MAJOR: Criminal Justice / Criminology DEGREE: B.S.

BASIC LAW ENFORCEMENT TRAINING (B.L.E.T.) CERTIFIED? Yes YEAR GRADUATED: 2015

OTHER SCHOOLS ATTENDED (TRADE, PROFESSIONAL, ETC.):

COA: BLET - Graduated on Dec 15th, 2015
Southern New Hampshire University: M.S. in Justice Studies (degree conferred
on 10/15/2015 - official graduation day 5/2016)

LIST ANY SPECIAL SKILLS YOU POSSESS AND MACHINES YOU CAN OPERATE SUCH AS
COMPUTER, TYPEWRITER, ETC.

PAGE 3 APPLICATION FOR EMPLOYMENT (RECORD OF EMPLOYMENT)

HAVE YOU EVER BEEN FIRED OR ASKED TO RESIGN FROM A POSITION? Yes
IF YES, FROM WHERE? AND EXPLAIN CIRCUMSTANCES: See F-3: Personal History Statement.

NAME OF PRESENT OR LAST COMPANY: Shaw University PHONE: 919-719-1897
919-828-1730
ADDRESS OF COMPANY: 118 E. South Street Raleigh NC 27601
TYPE OF BUSINESS: Educational TITLE OF POSITION: Security officer pending
Campus Police officer
Certified
DATES OF EMPLOYMENT: FROM 11/28/2016 TO 2/20/2017
NAME OF SUPERVISOR: Lee Wood, HR Director
MAY WE CONTACT PRESENT EMPLOYER? Yes
DESCRIPTION OF WORK: Maintain public safety.

FINAL SALARY: \$ 35,000 per year PER year

REASON FOR LEAVING: Terminated

.....
NAME OF
COMPANY: Louisburg College PHONE 919-497-3294
ADDRESS OF COMPANY: 501 W. Main Street Louisburg NC 27549
TYPE OF BUSINESS: Educational TITLE OF POSITION: Campus safety officer
DATES OF EMPLOYMENT: FROM Nov. 21, 2016 TO January 5th 2017
NAME OF SUPERVISOR: Terry Wright, HR Director
MAY WE CONTACT PAST EMPLOYER? Yes
DESCRIPTION OF WORK: Observe & report, open/close buildings, make quarterly rounds, etc.

FINAL SALARY: \$ 13.40 PER hour

REASON FOR LEAVING: Terminated

PAGE 4 APPLICATION FOR EMPLOYMENT (RECORD OF EMPLOYMENT)

NAME OF COMPANY: NC DPS: Bertiz Corrections PHONE: 252-794-8600
ADDRESS OF COMPANY: 218 E. Cooper Hill Rd Windsor NC 27983
TYPE OF BUSINESS: Prison TITLE OF POSITION: Corrections officer
DATES OF EMPLOYMENT: FROM 11/5/2012 TO 9/11/2015
NAME OF SUPERVISOR: Nina Griswell, HR Director
MAY WE CONTACT PAST EMPLOYER: Yes
DESCRIPTION OF WORK: Care, custody & control of state offenders

FINAL SALARY: \$ 29,800 PER year
REASON FOR LEAVING: Terminated, reinstated after appeal. Resigned: personal reasons (finished) on 9/11/15 for (bick)

NAME OF COMPANY: Health Care Options PHONE: 252-482-6555
ADDRESS OF COMPANY: 819 W. Broad Street Edenton, NC 27932
TYPE OF BUSINESS: Health Care TITLE OF POSITION: Receptionist
DATES OF EMPLOYMENT: FROM 5/8/2012 TO 8/31/2012
NAME OF SUPERVISOR: Shirley Stokes, Executive Director
MAY WE CONTACT PAST EMPLOYER? Yes
DESCRIPTION OF WORK: Clinical / Administrative

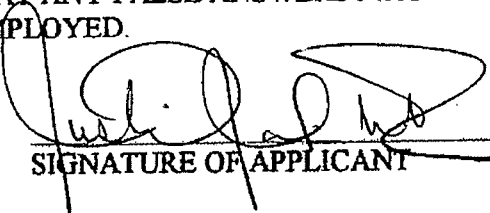
FINAL SALARY: \$ 8.00 PER hour
REASON FOR LEAVING: Site office closed due to budget issues

PAGE 5 APPLICATION FOR EMPLOYMENT

IN THE SPACE BELOW, WRITE A SHORT PARAGRAPH STATING WHY YOU WANT TO BE A DEPUTY SHERIFF. USE COMPLETE SENTENCES, GOOD GRAMMAR AND SPELLING.

From youth to current, I have always desired to be a police officer / sheriff's deputy. I remember watching police shows as a youngster and being attracted to law enforcement. In other words, it's in my blood - apart of me. After graduating high school, I enrolled in college and graduated with my B.S. in Criminal Justice from the University of Mount Olive (2012). Afterwards, I graduated with my M.S. in Justice Studies from Southern New Hampshire University (2015). Before finishing my graduate degree, I enrolled in BLET at College of the Albemarle and graduated in December 2015. All of my educational accomplishments have prepared me for a career in law enforcement. I look forward to starting my career and gaining a ~~great~~^{new} wealth of experience.

I CERTIFY THAT THE ANSWERS GIVEN IN THIS APPLICATION ARE CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT ANY FALSE ANSWERS MAY BE USED AS GROUNDS FOR DISMISSAL IN THE EVENT I AM EMPLOYED.


SIGNATURE OF APPLICANT

DATE

3/14/2017

PLEASE NOTE: THIS APPLICATION WILL BE KEPT FOR 6 MONTHS AND THEN DESTROYED

CHARACTER REFERENCES

DO NOT LIST MERE ACQUAINTANCES, PREVIOUS EMPLOYERS OR RELATIVES. LIST ONLY PERSONS WHO KNOW YOU WELL, EITHER PERSONALLY OR IN BUSINESS, WHO CAN ATTEST TO YOUR CHARACTER

NAME: Mr. T. J. Langely, State Trooper

ADDRESS: 163 Stevenson Lane Hartford CT 27944

PHONE: 252-619-7185 (cell)

NAME: Mrs. Brenda Hawkins

ADDRESS: 334 Brayhill Rd Edenton NC 27932

PHONE: 252-333-6833 (cell)

NAME: Dr. Ellen Jordan, Vice President of Academic Affairs, Univ. of Mt. Olive

ADDRESS: 630 Hudson Street Mount Olive, NC 28365

PHONE: 919-221-8199 (cell)

NAME: Pastor Janice Williams

ADDRESS: 218 E. Maple Street Mount Olive NC 28365

PHONE: 919-330-2124 (cell)

PAGE 7 APPLICATION FOR EMPLOYMENT

HAVE YOU EVER BEEN CHARGED WITH ANY CRIMINAL OR TRAFFIC VIOLATIONS, INCLUDING TRAFFIC CITATIONS? Yes, 3 traffic tickets

IF YES, LIST CHARGE, EXPLANATION, PLACE OF ARREST AND DISPOSITION: See F-3: Personnel history statement. 1) 2/23/2010 Failing to yield Goldsboro PD (Dismissed by DA), 2) 12/11/2010 Going too fast for conditions NC SHP (Dismissed by DA), 3) 5-13-2015 Going too fast in SS mple (paid ticket before court).

HAVE YOU EVER BEEN SUED OR BEEN A PARTY TO A CIVIL ACTION? Yes, 1

IF YES, PLEASE EXPLAIN: I was sued by Mr. Larry Stokes in October or November 2012 for unpaid rent for \$300.00 approximately. Mr. Stokes decided to collect rent after I graduated from college. I never agreed to sue and the judge ruled in my favor. I voluntarily left his property and moved in with my grandmother.

HAVE YOU EVER HAD ANYTHING REPOSSESSED? No

IF YES, PLEASE LIST ITEM(S), LOCATION AND DATE(S): N/A

PLEASE LIST YOUR OUTSTANDING DEBTS. No delinquencies (creditors)
+ old medical bills

<u>ITEM(S)</u>	<u>BALANCE OWED</u>
<u>First Point Collections - Vidant Chowan Hospital</u>	<u>\$1800.00</u>
<u>First Point Collections - Vidant Chowan Hospital</u>	<u>\$1278.00</u>
<u>SCA collections</u>	<u>\$270.00</u>
<u>ARC Management Group</u>	<u>\$31.00</u>
<u>First point Collections Vidant Chowan Hospital</u>	<u>\$2300.00</u>
	<u>\$</u>
	<u>\$</u>
	<u>\$</u>
	<u>\$</u>

DO YOU SMOKE? No IF YES, HOW MUCH? _____

DO YOU DRINK ALCOHOL? Yes IF YES, HOW OFTEN? Special occasions / very seldom

HAVE YOU EVER TRIED DRUGS? No IF YES, WHAT TYPE(S) AND APPROXIMATE DATE(S) OF LAST USE:

N/A

HAVE YOU EVER BEEN SERVED ANY DOMESTIC VIOLENCE ORDER? No IF YES, LIST DATE AND COUNTY / STATE:

N/A

ARE YOU WILLING TO MOVE TO VANCE COUNTY IF CONSIDERED FOR THIS POSITION? Yes

ARE YOU WILLING TO SIGN A TWO-YEAR CONTRACT FOR EMPLOYMENT? Yes


SIGNATURE OF APPLICANT

3/4/2017
DATE

AUTHORIZATION TO RELEASE INFORMATION

TO WHOM IT MAY CONCERN:

I hereby authorize the Sheriff of Vance County or any authorized representative of the Vance County Sheriff's Office, within 6 months of this date, to obtain any information in your files pertaining to my employment, military, medical, credit or educational records including, but not limited to academic achievement, attendance, athletic, personal history, disciplinary, medical and credit records. I hereby direct you to release such information upon the request of the bearer. This release is executed with full knowledge and understanding that the information is for the official use of the Vance County Sheriff's Office. Consent is granted for the Sheriff of Vance County or his agents to furnish such information as is described above to third parties in the course of fulfilling its official responsibilities. I hereby release you, as the custodian of such records, and any university, college, school, hospital or repository of medical records, credit bureau, lending institution, bank, consumer reporting agency, previous or current employer, or retail business establishment including its officers, employees, or related personnel, both individually and collectively, from any and all liability for damages of whatever kind, which may at any time result to me, my family, my heirs, or associates due to compliance with this authorization and request to release information pertaining to me, or any attempt to comply with such request contained therein. Should there be any question as to the validity of this release, you may contact me as indicated below.

Name: Justin Jamel White
(Printed or Typed)

Signature _____

Address: Liberty Place Mailbox 12

Raleigh NC 27616

Telephone (919) 961-2413

Witness: _____

NOTARY PUBLIC

Subscribed and sworn to before me
this _____ day of _____, 20____.

My Commission Expires: _____

Signature of Notary

SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
5:19-cv-00467-BO

**CERTIFIED
TRANSCRIPT**

JUSTIN J. WHITE,

Plaintiff,

v.

VANCE COUNTY, NORTH CAROLINA,
VANCE COUNTY SHERIFF'S OFFICE,
PETER WHITE, in his official and
individual capacities,
LAWRENCE D. BULLOCK, in his
official and individual capacities,
WELDON WALLACE BULLOCK, in his
official and individual capacities.

Defendants.

ZOOM DEPOSITION OF PETER WHITE, 30 (b) (6),
held in North Carolina on Friday, February 26, 2021
commencing at 10:17 A.M., before Dodie George,
Shorthand Reporter and Notary Public.



(866) 715-7770
advancedONE.com

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 THE LAW OFFICES OF SHARIKA M. ROBINSON, PLLC 3 BY: SHARIKA M. ROBINSON, ESQUIRE (VIA ZOOM) 4 BY: MICHAEL MCGURL, ESQUIRE (VIA ZOOM) 5 info@sharikamrobinsonlaw.com 6 10230 Berkeley Place Drive, Suite 220 7 Charlotte, North Carolina 28262 8 704.561.6771 9 Counsel for Plaintiff 10 11 WOMBLE BOND DICKINSON, LLP 12 BY: CHRISTOPHER J. GEIS, ESQUIRE (VIA ZOOM) 13 BY: LOUISA C. CLARK, ESQUIRE (VIA ZOOM) 14 chris.geis@wbd-us.com 15 louis.clark@wbd-us.com 16 One West 4th Street 17 Winston-Salem, North Carolina 27101 18 336.721.3600 19 Counsel for Defendants 20 21 Also Present: 22 Joi Nelson 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 P R O C E E D I N G S 2 PETER WHITE 30(b)(6), 3 having been duly sworn, testifies as follows: 4 EXAMINATION 5 BY MS. ROBINSON: 6 Q. Sheriff White, can you hear me? Good 7 morning. 8 A. Good morning. I can hear you. 9 Q. Okay. So good morning. Thank you for 10 for sitting down and -- and agreeing to answer 11 questions on behalf of your office and your tenure 12 there. So I very -- very much appreciate that. 13 As I told Mr. Bullock yesterday, I'm ve 14 -- my style is very conversational. And -- and s 15 it's just us having a conversation about some of 16 policies, practices and things that went on when 17 were sheriff there as it relates to Mr. White's 18 employment. 19 And for purposes of this, do you mind i 20 call you Sheriff White and I will call Mr. White, 21 Mr. White? 22 A. That will be fine. 23 MS. ROBINSON: Okay. And, Chris, just 24 -- a matter of -- a preliminary matter before 25 get started, I want to address what occurred</p>
<p style="text-align: right;">Page 3</p> <p>1 EXAMINATION INDEX 2 PETER WHITE, 30 (b)(6) 3 BY MS. ROBINSON 4 5 6 INDEX OF EXHIBITS 7 NO. 8 10 Personnel Action Form *Exhibit retained* 9 11 F-5 Report of Separation *Exhibit retained* 10 12 Directives A.1 & A.2 11 13 Directive B.6 12 14 Directive B.9 13 15 Directive D.7 14 16 Directive E.2 15 17 Directive E.3 16 18 Request for Training Waiver 17 19 J. White's pay raise 18 20 Notice of Charge of Discrimination 19 21 J. White's Rebuttal and Complaint 20 22 Campbell Statement 21 23 P. White's Response 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 the record yesterday. We had that conversat 2 when we went off the record about you advisi 34 your client not to answer a question. And y 4 know the rules do not permit you to discuss 5 type of responses with your client in breaks 6 the record, off the record at all. 7 BY MS. ROBINSON: 8 Q. This has to be your testimony, Sheriff 9 White. Okay? 10 A. Okay. 11 Q. Okay. So my name is Sharika Robinson, 12 I represent The Law Offices of Sharika M. Robinson 13 And I want to know, have you ever been deposed 14 before? 15 A. Yes. 16 Q. Have you ever pro- -- provided testimon 17 before? 18 A. Yes. 19 Q. Okay. So you are familiar with the rul 20 yes and no and not uh-huh and huh-uh and all of 21 that? 22 A. Yes, I am. 23 Q. Okay. Are you prepared to testify toda 24 meaning that you aren't on -- you're -- you're -- 25 you're not impaired, you haven't used any substan</p>

Page 6	Page 8
<p>1 no medication; you're prepared to give testimony 2 under oath today? 3 A. I am. 4 Q. And so can you please state your name for 5 the record? 6 A. My name is Peter White. 7 Q. Your birth date? 8 A. 12/5/55. 9 Q. And can you please provide your address? 10 A. 60 Frank, F-R-A-N-K, Bullock, 11 B-U-L-L-O-C-K, Road, Manson, North Carolina. 12 is 27553. 13 Q. Have you always resided in North 14 Carolina? 15 A. Other than the time that I was in the 16 military and the time during my highway patrol 17 employment. 18 Q. Okay. So you would -- did you go to the 19 military out of high school or.... 20 A. Yes, out of high school. 21 Q. Okay. So did you go to Vance County High 22 School? 23 A. Yes, Vance Senior High. 24 Q. Okay. So let's start from there. So you 25 went to Vance Senior High and you graduated, and then</p>	<p>A. No. I was a police officer. 2 Q. Police officer. 3 Okay. What police department was that? This was Stovall, which is located not 5 far from here. It's in Granville County. 6 Q. How long were you there? 7 A. I was there about a year. 8 Q. And then where'd -- where'd you go? 9 I took a job at the Oxford Police 10 Department. 11 Q. How long were -- what was your title 12 there? 13 A. I was a police officer. 14 Q. And how long were you there? 15 A. I was there about three years, I believe 16 maybe a little more. 17 Q. Uh-huh. 18 A. I was there until 1981, August of 1981, 19 believe. 20 Q. And then what -- where'd you go? 21 I joined the North Carolina State Highway 22 Patrol. 23 Q. What was your title there? 24 State trooper. 25 Q. How long were you there?</p>
Page 7	Page 9
<p>1 you went to the military. What branch of the 2 military? 3 A. Marine Corp. 4 Q. How long were you in the Marine -- 5 A. I did two years. 6 Q. Then what did you do next? 7 A. I served my two years. I was discharged 8 honorably, came back home to Vance County, looked for 9 a job, worked two or three jobs like factory-type 10 stuff. That was in 1976. And began my law 11 enforcement career I believe in 1977. 12 Q. Okay. Did you have to go to college or 13 A. I attended Vance-Granville Community 14 College. I got two associate's degrees in 15 Q. Uh-huh. What are your degrees in? 16 A. One's in criminal justice, and the other 17 one is in therapeutic and municipal recreation, 18 basically recreation therapy. 19 Q. Like sports or something? 20 A. Well, it's kind of like a dual 21 can either work in a nursing home-type 22 in -- on the sports side. 23 Q. So you started your career in law 24 enforcement in 1977. Were you a deputy 25 or....</p>	<p>A. I was there until, I believe, 1985. I 2 remained in Wake County, but I was assigned to the 3 executive protection detail. Some people call it 4 -- government security detail. 5 Q. What does -- what does that entail? 6 A. It entails basically making sure nothing 7 happens to the governor when he's out and about or 8 his family members. You're responsible for 9 transporting him different places in the state, 10 law driving; if he flies, you fly with him, be it private 11 plane or commercial. If he flies overseas, a couple 12 of people on the detail have to go with him. 13 Q. And how long were you -- you said in 14 1985? 15 A. Around '85, yes. I did that for five 16 years. 17 Q. Okay. So, what, 1990? 18 A. Yes. 19 Q. Okay. Where did you go after that? 20 A. I was promoted to the rank of sergeant, 21 then was assigned to Martin and Pitt County here in 22 North Carolina. 23 Q. Were you -- you weren't with the highway 24 patrol then? 25 A. Yes, I was. I was promoted then, sent</p>

Page 10	Page 12
<p>1 there.</p> <p>2 Q. Okay. Well, when you say "sent there," you</p> <p>3 moved also?</p> <p>4 A. Yes. Well, I didn't establish a permanent</p> <p>5 residence. Actually I stayed in a motel most of the</p> <p>6 time I was there.</p> <p>7 Q. How long were you in that position?</p> <p>8 A. I was there right at a year, maybe a month</p> <p>9 or so more.</p> <p>10 Q. And what occurred next?</p> <p>11 A. I transferred from there at home to Vance</p> <p>12 County.</p> <p>13 Q. And you pat- -- you patrolled the whole</p> <p>14 county in that position?</p> <p>15 A. Basically I supervised the --</p> <p>16 the supervisors for the troopers that were here at</p> <p>17 that time.</p> <p>18 Q. How many people did you supervise?</p> <p>19 A. I believe it was 20 troopers.</p> <p>20 certain, but I believe it was 20 then in that</p> <p>21 position.</p> <p>22 Q. Okay. How many supervisors were there?</p> <p>23 A. There was three. There was a</p> <p>24 sergeant, myself as a sergeant and then</p> <p>25 individual with the rank of sergeant.</p>	<p>1 A. Yes. We supervised Vance, Warren and</p> <p>2 there, and you counties because the troopers worked tho</p> <p>3 three counties out of the Henderson office.</p> <p>4 Q. Had you established a residency in Vance</p> <p>5 County at that time?</p> <p>6 A. Let's see. Well, I was born in Vance</p> <p>7 County, but actually I grew up in Vance County an</p> <p>8 maybe went to school here. But I built a house here</p> <p>9 sometime around, I guess, 1992. But my parents</p> <p>10 resided here.</p> <p>11 Q. Okay. So your -- your family, everybod</p> <p>12 you just wanted to come back home?</p> <p>13 A. Well, where I was, as I said earlier, I</p> <p>14 staying in a motel. And, you know, that got to b</p> <p>15 was a little bit aggravating. And once I found out the</p> <p>16 there was an opening here, I decided it would be best f</p> <p>17 me to come back here.</p> <p>18 Q. Okay. And so how long -- well, after y</p> <p>19 I requested your lateral transfer to first sergeant</p> <p>20 how long were you in that position in Vance Count</p> <p>21 A. I'm thinking maybe two years.</p> <p>22 Q. Okay. And so what happened next?</p> <p>23 A. I was promoted to the rank of lieutenant</p> <p>24 and assigned to the Fayetteville office.</p> <p>25 Q. And how long were you in that position?</p>
Page 11	Page 13
<p>1 Q. And did y'all split the county for....</p> <p>2 A. Well, no. Basically each of us were the</p> <p>3 first sergeant supervised myself and the other</p> <p>4 sergeant, and basically we supervised the troopers.</p> <p>5 Q. It was like joint supervision?</p> <p>6 A. Yes. Yes.</p> <p>7 Q. Okay. And how long were you in that</p> <p>8 position?</p> <p>9 A. I believe it was about seven years that --</p> <p>10 Q. So we're at 1998 now. So -- and what</p> <p>11 occurred next?</p> <p>12 A. After that, I was promoted to the rank of</p> <p>13 first sergeant, and I was transferred to Roxboro,</p> <p>14 which is Person County. I supervised the troopers</p> <p>15 Person and Caswell counties.</p> <p>16 Q. And how long were you there?</p> <p>17 A. I think that was just a little bit over a</p> <p>18 year.</p> <p>19 Q. And then what happened?</p> <p>20 A. I requested a lateral transfer there. There</p> <p>21 was a vacancy in the first sergeant's position here,</p> <p>22 and I was able to come back here as the first</p> <p>23 sergeant and supervise the troopers and the sergeant</p> <p>24 that was here during that time.</p> <p>25 Q. And by here, you mean Vance County?</p>	<p>1 A. I was there a year or just a little bit</p> <p>2 more. the</p> <p>3 Q. What were your duties?</p> <p>4 A. I was a lieutenant. And myself, one ot</p> <p>5 lieutenant and a captain basically supervised fir</p> <p>6 sergeants in something like 13 counties down that</p> <p>7 way.</p> <p>8 Q. When you say "supervised," what does</p> <p>9 that -- what did that entail?</p> <p>10 A. Well, we kind of monitored what they we</p> <p>11 doing, reviewed their paperwork, held regular</p> <p>12 meetings with them, tried to assist them in any w</p> <p>13 Roxboro could, basically making sure they were doing w</p> <p>14 the troopers were supposed to do.</p> <p>15 Q. Did you handle HR issues, any of that,</p> <p>16 workplace complaints?</p> <p>17 A. Some, yes.</p> <p>18 Q. Did you have the ability to hire and fi</p> <p>19 A. No, but I could recommend hiring and</p> <p>20 there. There</p> <p>21 Q. Okay. How long were you in that</p> <p>22 position?</p> <p>23 A. In Fayetteville I think it was just --</p> <p>24 a little over a year.</p> <p>25 Q. Okay. And what happened next?</p>

Page 14	Page 16
<p>1 A. I -- I took another lateral transfer to the 2 Raleigh office on Blue Ridge Road still in the 3 lieutenant's position. 4 Q. How long were you there in Raleigh? 5 A. I -- I want to say I was in that 6 lieutenant's position probably for another year, 7 maybe a little more. 8 Q. And the -- was the Raleigh office 9 structured the same as the Fayetteville office? 10 A. Yeah, similarly, just the counties were 11 different. There were fewer -- there were fewer 12 counties supervising the Raleigh office than there 13 in the eastern part of North Carolina. 14 Q. Okay. And what happened next? 15 A. After that, I was promoted to the rank of 16 captain and still in Raleigh assigned to the 17 then called communications and logistics 18 people referred it to as C&L. 19 Q. And what -- what did that job entail? 20 A. Well, basically I was responsible for 21 purchasing everything that the highway patrol used 22 a day-to-day basis: automobiles, tires, auto parts, 23 fuel, pens, papers, paper clips, basically whatever 24 the -- the highway patrol used day-to-day. 25 Q. So were you supervising anyone at that</p>	<p>1 and logistics department? 2 A. Yes. 3 Q. Okay. Okay. And then how long were you 4 in Raleigh? 5 A. Until my retirement from there. 6 Q. When did you retire? 7 A. I believe it was the last day of 2005 or 8 might have been the first day of 2006. I want to 9 last day of 2005. 10 Q. And what did you do next? 11 A. I came back here to Vance County, which 12 was And shortly thereafter I decided that I would 13 run for sheriff of Vance County. 14 Q. What year did you run for sheriff? 15 A. 2006. 16 Q. So tell me about that process. What was 17 like? 18 A. Well, basically you -- you file, pay your 19 filing fee. And then you begin -- you begin -- begin 20 campaigning, trying to, you know, get people to 21 support you, tell them why you're running, what your 22 platform is and just prepare for the scrutiny 23 by whatever the agony that comes along with it. 24 Q. What was your platform? 25 A. Basically doing the right thing, treating</p>
Page 15	Page 17
<p>1 point? 2 A. Yes. 3 Q. How many officers? 4 A. I don't recall how many officers there were, 5 probably -- at that point it was probably about three 6 or four that was actually on what we called the 7 complex with me, and there were several other 8 That entailed supervising, I think, nine highway 9 patrol garages across the state as well as the county, 10 repair shops and also communication centers. And 11 also supervised what we called the in addition unit 12 that worked in the state across North Carolina. 13 supervised the -- the motor unit, as well as the 14 motorcycle units, and our aviation unit, which 15 included several helicopters. 16 Q. And how long were you in that position? 17 A. I'm not sure. Maybe a couple of years as 18 captain. 19 Q. Okay. And then what happened next? 20 A. I was promoted to the rank of major and 21 remained at that location. 22 Q. And what -- what does a major do? 23 A. I kept basically my same duties, but I 24 didn't move. I was just elevated in rank. 25 Q. And so were you still in the communications</p>	<p>1 everybody right regardless of your ZIP code or your 2 race or any of that stuff; basically being a sheriff 3 for everybody versus certain ZIP codes, is what I 4 did was public. And I also told them that if I 5 elected them they would never hear me say, "this is my 6 county." 7 civilians. Q. Why did you say that? 8 highway A. Because it's not my county. I don't own 9 as the county, and I stressed that we were all in it 10 together. It's just as much their county as it is 11 mine. 12 Q. Do you remember who you ran against? 13 A. Yes, pretty much. I remember the last 14 names. The sheriff at the time, yes, I remember 15 he was. 16 Q. Who was he? 17 A. His name was Thomas Breedlove. 18 Q. Okay. So you won that election? 19 A. Yes. I won the general -- the primary. 20 I was asked for a runoff. I won the general. And right 21 after that, I believe it was a sergeant with the 22 sheriff's office, he filed a petition, garnered 23 signatures; and the board of election allowed him 24 to run against me as well. 25 Q. What happened next?</p>

Page 18	Page 20
<p>1 A. I won.</p> <p>2 Q. Okay. So you won.</p> <p>3 When were you sworn in?</p> <p>4 A. November of 2006, I believe, and</p> <p>5 in December of 2006.</p> <p>6 Q. How was the sheriff's office structured</p> <p>7 then or how....</p> <p>8 A. I'm not sure how it was structured before I</p> <p>9 got in there.</p> <p>10 Q. How did you structure it?</p> <p>11 A. Well, basically I put people in places</p> <p>12 that I would have supervisors to do whatever needed</p> <p>13 to be done.</p> <p>14 Q. Uh-huh.</p> <p>15 A. Some were there when I got there, and some</p> <p>16 came in years later.</p> <p>17 Q. Okay. So just -- just for a moment, we</p> <p>18 talked about all your different promotions. And I</p> <p>19 would assume you -- you probably -- did you have to</p> <p>20 take tests or exams to be promoted or --</p> <p>21 A. Yes. It's an entire process.</p> <p>22 Q. So let's talk about the structure of the</p> <p>23 sheriff's office under your leadership. And if you</p> <p>24 will just explain to me like a certified</p> <p>25 deputy, lieutenant, just that, all that</p>	<p>1 Vance County Sheriff's Office payroll?</p> <p>2 A. Yes.</p> <p>3 Q. Did the department grow any under your</p> <p>4 leadership? So....</p> <p>5 A. In term -- no, not in terms of numbers,</p> <p>6 and You know, it may have grown a little bit,</p> <p>7 not much.</p> <p>8 Q. And did you maintain the same structure</p> <p>9 from 2006 until your retirement?</p> <p>10 A. No, not -- not necessarily. It was</p> <p>11 in places, but it wasn't the exact same structure,</p> <p>12 I never could believe.</p> <p>13 Q. What did you change?</p> <p>14 A. We -- we got -- we added -- later on do</p> <p>15 we added a -- a position. It was called</p> <p>16 gang resource officer. That was new. The overall</p> <p>17 structure with the sergeants, lieutenants, captain</p> <p>18 And I know, that pretty much was very close to being</p> <p>19 the same.</p> <p>20 Q. So gangs were an issue in Vance County?</p> <p>21 A. Yes.</p> <p>22 Q. What type of gang?</p> <p>23 And if you</p> <p>24 What type of gangs?</p> <p>25 A. Just the street gangs. Some of them were</p>
Page 19	Page 21
<p>1 A. A certified deputy is one that has</p> <p>2 completed the BLET course somewhere during his or her</p> <p>3 career. Non-certified of course have not done that.</p> <p>4 yet. Then we have sergeants that basically</p> <p>5 supervises the deputies. Then we have lieutenants</p> <p>6 that supervise the sergeants and then captain. And</p> <p>7 the chief deputy position is generally a</p> <p>8 position.</p> <p>9 Q. How large is the Vance County Sheriff's</p> <p>10 Office?</p> <p>11 A. I want to say it was about 40</p> <p>12 maybe. That may not be the exact number, but I</p> <p>13 believe that's pretty close to what it was.</p> <p>14 And then, well, I should say</p> <p>15 -- yeah, deputies. Well, any members of</p> <p>16 sheriff's office, which included lieutenants,</p> <p>17 captains and then about six civilians, I believe.</p> <p>18 Q. When you say "civilians," what does that</p> <p>19 mean?</p> <p>20 A. Office staff.</p> <p>21 Q. Office staff?</p> <p>22 A. Yes.</p> <p>23 Q. So you're talking like secretaries?</p> <p>24 A. Basically, yes.</p> <p>25 Q. And these are all people who were</p>	<p>1 has organized. Some weren't. Some were homegrown.</p> <p>2 I was like what we call the real gangs.</p> <p>3 Q. What are the real gangs?</p> <p>4 A. We had Bloods, Crips, a couple others.</p> <p>5 I don't recall their name.</p> <p>6 Q. Uh-huh. What were the races?</p> <p>7 A. The Bloods and the Crips are mostly aft</p> <p>8 African-American. There was another group called</p> <p>9 Sistas or something similar to that. They were</p> <p>10 primarily Hispanic.</p> <p>11 Q. Were you able to -- I don't want to say</p> <p>12 eliminate. But were you able to get that under</p> <p>13 control, the gangs?</p> <p>14 when I say Well, they didn't give us much problem.</p> <p>15 They kind of policed themselves, so to speak.</p> <p>16 Q. What does that mean?</p> <p>17 A. Well, they kind -- they dealt with their</p> <p>18 situations. They didn't particularly involve</p> <p>19 enforcement. Every now and then there would be,</p> <p>20 a shooting that we may have thought was gang-rela</p> <p>21 but they weren't out threatening the public or</p> <p>22 anything like that.</p> <p>23 Q. Okay. So let's go back to the structur</p> <p>24 the -- the office, the sheriff's office. Did --</p> <p>25 Vance County pay for BLET training?</p>

Page 22	Page 24
<p>1 A. Yes.</p> <p>2 Q. How did that process work?</p> <p>3 A. For the deputies that were not certified,</p> <p>4 when we hired them?</p> <p>5 Q. Uh-huh.</p> <p>6 A. At some point they were scheduled to attend they brought it in themselves. Once the</p> <p>7 basic law enforcement training at a community college, applications were received, I would normally get</p> <p>8 depending on which college offered the course then what</p> <p>9 time.</p> <p>10 Q. What did you look for when you hired --</p> <p>11 a deputy when you hired a deputy?</p> <p>12 A. Well, there were several things that were determined to -- or that we felt needed to be</p> <p>13 looked at. Excuse me. Number one, of course, interviewed, we would set up the interview for</p> <p>14 would be their background.</p> <p>15 Q. Background. What do you mean,</p> <p>16 background?</p> <p>17 A. We would start -- we would start with the sheriff's office as a whole, but it was me.</p> <p>18 investigation, and we would go from there. We wanted --</p> <p>19 to know where they've lived; what jobs they've had. Uh-huh. Right. So you mentioned the</p> <p>20 little bit about their criminal record; they're administrative captain. What I'm -- I'm trying to</p> <p>21 family; education level; reputation, you know, to get the process. So I get that you were ultimate</p> <p>22 community that they lived in; that type of the decision maker. But what was your -- what did</p> <p>23 of course whether they were certified or not, A. Okay.</p> <p>24 experience. It was a whole host of things. Q. -- consist of?</p> <p>25 MS. ROBINSON: Okay. I see that the A. The process -- there's an interview panel</p>	<p>1 structure at Vance County.</p> <p>2 A. The hiring, individuals apply. Some would</p> <p>3 certifying their application. During the latter part</p> <p>4 of my tenure as sheriff, they could apply online,</p> <p>5 most people either mailed their application in or</p> <p>6 they brought it in themselves. Once the</p> <p>7 applications were received, I would normally get</p> <p>8 them what</p> <p>9 I would look through them, and then most</p> <p>10 of the time I would pass it on to the administrative</p> <p>11 captain. He would review it. And then the ones</p> <p>12 that were determined to -- or that we felt needed to be</p> <p>13 of course, interviewed, we would set up the interview for</p> <p>14 them.</p> <p>15 Q. So who is -- who is "we"?</p> <p>16 A. When I say "we," basically I'm speaking</p> <p>17 of the sheriff's office as a whole, but it was me.</p> <p>18 We wanted --</p> <p>19 they're administrative captain. What I'm -- I'm trying to</p> <p>20 get the process. So I get that you were ultimate</p> <p>21 the decision maker. But what was your -- what did</p> <p>22 who did your team --</p> <p>23 not, A. Okay.</p> <p>24 Q. -- consist of?</p> <p>25 A. The process -- there's an interview panel</p>
Page 23	Page 25
<p>1 documents just came in, Mr. Geis. Do you want to</p> <p>2 take a second to look at them? that consists of -- normally it was -- it was li</p> <p>3 MR. GEIS: No, that's okay. If you captain. At times it was a captain, maybe two</p> <p>4 you're free to just go ahead and -- 4 lieutenants and sometimes even a sergeant. Then</p> <p>5 MS. ROBINSON: Uh-huh. 5 again, it might have been two captains, lieutenant</p> <p>6 MR. GEIS: -- go into them as you see the process was the same.</p> <p>7 BY MS. ROBINSON: 7 Q. Okay. Let's -- let's dial it back some</p> <p>8 Q. So you looked for community involvement, So how many different departments did --</p> <p>9 reputation, education. 9 does the Vance County Sheriff Office have?</p> <p>10 And what type of character were you looking I'm not sure if it's seven. We've got</p> <p>11 for in a deputy? 11 patrol and investigations, civil, court, what we</p> <p>12 A. Well, we -- we were looking for 12 people drug unit, K-9, and I may be missing one.</p> <p>13 with, you know, good character. 13 Q. So what does the patrol department do?</p> <p>14 Q. Okay. And what is good character? A. Basically they -- they patrol the count</p> <p>15 A. Well, you didn't have to be perfect, paying particular attention to property, business</p> <p>16 you know, obviously you couldn't have been homes, looking out for break-ins, larcenies,</p> <p>17 arrested and drunk and disorderly type stuff, basically protecting the citizens and their prop</p> <p>18 basically being what the average person 18 Q. And what does the investigation....</p> <p>19 consider a good person. 19 A. They -- they are the detectives. A lot</p> <p>20 Q. So did you -- did you perform 20 interviews of</p> <p>21 conduct interviews? 21 breaking and entering call. A large amount of st</p> <p>22 A. Yes, I did some. 22 may -- may have been stolen, and that would</p> <p>23 Q. You said you did some? 23 oftentimes be referred to a detective or an</p> <p>24 A. Yes. 24 investigator.</p> <p>25 Q. Tell me about the structure, 25 hiring Q. And the civil department?</p>	<p>1 that consists of -- normally it was -- it was li</p> <p>2 four individuals, I believe. Normally it was a</p> <p>3 captain. At times it was a captain, maybe two</p> <p>4 lieutenants and sometimes even a sergeant. Then</p> <p>5 again, it might have been two captains, lieutenant</p> <p>6 the process was the same.</p> <p>7 Q. Okay. Let's -- let's dial it back some</p> <p>8 So how many different departments did --</p> <p>9 does the Vance County Sheriff Office have?</p> <p>10 I'm not sure if it's seven. We've got</p> <p>11 patrol and investigations, civil, court, what we</p> <p>12 people drug unit, K-9, and I may be missing one.</p> <p>13 Q. So what does the patrol department do?</p> <p>14 A. Basically they -- they patrol the count</p> <p>15 paying particular attention to property, business</p> <p>16 homes, looking out for break-ins, larcenies,</p> <p>17 stuff, basically protecting the citizens and their prop</p> <p>18 Q. And what does the investigation....</p> <p>19 A. They -- they are the detectives. A lot</p> <p>20 interviews of</p> <p>21 breaking and entering call. A large amount of st</p> <p>22 may -- may have been stolen, and that would</p> <p>23 oftentimes be referred to a detective or an</p> <p>24 investigator.</p> <p>25 Q. And the civil department?</p>

Page 26	Page 28	Page 29
<p>1 A. Basically the civil department 2 civil papers. 3 Q. And the court? 4 A. Court included working security 5 entrance to the courthouse X-ray machine 6 acting as bailiffs. 7 Q. And the drug unit? 8 A. Basically they stayed on the lockout for 9 drug activity in the county. They made 10 Primarily that was their function. Occasionally they 11 would engage in some patrol. 12 Q. And the K-9? 13 A. The K-9s were used in several instances 14 some missing children, Alzheimer's patients, 15 tracking them. The K-9 served kind of 16 to their handler basically, and they were 17 sometimes to sniff out narcotics. 18 Q. So you mentioned the administrative 19 captain. What would that -- where would that person 20 be located in that structure? 21 A. It would a captain, but he would not 22 the -- the -- he wouldn't be considered 23 patrol captain. He would kind of be off 24 still under the sheriff and the chief deputy, but not 25 in the patrol supervision-type lineup.</p>	<p>1 just serve. Q. Did you have an evidence department? 2 A. Yes. 3 Q. So that's a -- 4 A. Well, it wasn't -- it wasn't a -- no. 5 and also -- we had evidence, of course; but I -- I don't 6 believe -- no, evidence was not separate. It was 7 a separate section. 8 Q. Okay. What would that fall under? Would 9 the evidence go under administrative or.... 10 Generally, yes. 11 Q. And so each of these seven departments 12 structured the way you suggested -- indicated at 13 first? 14 To the best that I recall. 15 A partner. Q. The certified deputy, non-certified 16 sergeants, lieutenant, captains, chief, is that how 17 each department was structured? 18 A. No. That's the sheriff's office as a 19 whole. 20 Q. Uh-huh. So -- so there wasn't, say, a 21 investigation's captain? 22 The same as a No, not with a title investigation's 23 captain. No. 24 Okay. So how -- how -- so when you say 25 so in K- -- the K-9 unit or department, did you</p>	<p>1 there -- you had lieutenants in that department? 2 A. The K-9 unit was generally supervised by 3 sergeant. There may have -- one time may have been 4 a lieutenant there. I'm not sure. 5 Q. Were these -- were the -- were the deputy 6 captains, trained or did they get in a certain department 7 and stick there? 8 A. Some, I guess you could say they were 9 cross-trained because they -- some moved from one 10 section within the sheriff's office to another from 11 time to time. 12 Q. Well, it wasn't like they could go in one 13 day, and one day you'll be in administrative, the 14 next day you'll be in patrol or.... 15 A. No. 16 Q. They had a specific location, the deputy 17 did? 18 They had specific duties, yes. 19 Q. And specific -- did they have specific 20 supervisors? 21 A. Yes. 22 Q. Okay. So going back to the administrative 23 department, and you -- and that is a department that 24 assisted you with hiring? 25 A. It's -- it's really not -- I wouldn't call</p>
<p>1 Q. So kind of up there in its own little 2 wing? 3 A. No, not really. 4 Q. Okay. So -- so would the administrative 5 captain fall under any of these, the six categories, 6 departments that you named: patrol, investigations, civil 7 or drug unit -- 8 A. I believe -- 9 Q. -- K-9s? 10 A. I believe the administrator was separate 11 Q. So -- 12 A. -- in another department. I think that's 13 the one that I missed, I believe. 14 Q. Okay. And what did the administrative 15 department do? 16 A. Basically paperwork that comes into the 17 sheriff's office. A lot of stuff would come directly 18 to me. A lot of times I would review it and funnel 19 it to the administrative captain. The administrative 20 captain at times would coordinate different training 21 activities that was going on that the deputies 22 needed. He would set that up, follow through with 23 the paperwork at ground investigations, some department 24 investigations internally with the sheriff's 25 office.</p>	<p>1 little -- you had lieutenants in that department? 2 A. The K-9 unit was generally supervised by 3 sergeant. There may have -- one time may have been 4 a lieutenant there. I'm not sure. 5 Q. Were these -- were the -- were the deputy 6 captains, trained or did they get in a certain department 7 and stick there? 8 A. Some, I guess you could say they were 9 cross-trained because they -- some moved from one 10 section within the sheriff's office to another from 11 time to time. 12 Q. Well, it wasn't like they could go in one 13 day, and one day you'll be in administrative, the 14 next day you'll be in patrol or.... 15 A. No. 16 Q. They had a specific location, the deputy 17 did? 18 They had specific duties, yes. 19 Q. And specific -- did they have specific 20 supervisors? 21 A. Yes. 22 Q. Okay. So going back to the administrative 23 department, and you -- and that is a department that 24 assisted you with hiring? 25 A. It's -- it's really not -- I wouldn't call</p>	<p>1 there -- you had lieutenants in that department? 2 A. The K-9 unit was generally supervised by 3 sergeant. There may have -- one time may have been 4 a lieutenant there. I'm not sure. 5 Q. Were these -- were the -- were the deputy 6 captains, trained or did they get in a certain department 7 and stick there? 8 A. Some, I guess you could say they were 9 cross-trained because they -- some moved from one 10 section within the sheriff's office to another from 11 time to time. 12 Q. Well, it wasn't like they could go in one 13 day, and one day you'll be in administrative, the 14 next day you'll be in patrol or.... 15 A. No. 16 Q. They had a specific location, the deputy 17 did? 18 They had specific duties, yes. 19 Q. And specific -- did they have specific 20 supervisors? 21 A. Yes. 22 Q. Okay. So going back to the administrative 23 department, and you -- and that is a department that 24 assisted you with hiring? 25 A. It's -- it's really not -- I wouldn't call</p>

Page 30	Page 32
<p>1 it a department. It was just administrative generally the most senior person on the panel. I</p> <p>2 Q. So you -- you were saying that you would do captains, it would be most likely the</p> <p>3 receive an application, you would go through it, and administrative captain.</p> <p>4 then you would reach out to the administrative Q. Uh-huh. They would meet with you and</p> <p>5 captain? say -- and say what?</p> <p>6 A. Yes, normally or possibly the chief deputy. They would let me know how they felt th</p> <p>7 Depended on how many applicants we had and how interview went.</p> <p>8 that we had planned to interview. Q. Uh-huh.</p> <p>9 Q. How many applicants did you get, say, in a And then a recommendation would be made</p> <p>10 month or in a quarter on average? to do we proceed with this particular applicant.</p> <p>11 A. I can't say because sometimes we would get Who made the decision to have multiple</p> <p>12 several. Sometimes we wouldn't get any 12 You interviews? So was there one interview, two</p> <p>13 it just varied. 13 interviews, three interviews?</p> <p>14 Q. Okay. What -- what was several? A. Well, it depended. It varied on the</p> <p>15 A. We might get two or three a month. individual applicant based on how they answered</p> <p>16 might go three or four months and not get any questions, based on if they mentioned certain ite</p> <p>17 Q. Okay. So you said you would convert a they had and couldn't put their hands on it</p> <p>18 panel? right then, or the panel may have decided some</p> <p>19 A. At right before the time of the -- questions were not thoroughly answered. They may</p> <p>20 the time of the interview. call that individual back in and kind of revisit</p> <p>21 Q. Uh-huh. Would you -- you say call, you'd</p> <p>22 send an e-mail. Was this a regular panel or... Q. Were you involved in that decision to c</p> <p>23 A. No. Normally if it was a captain that was No.</p> <p>24 in charge of the panel, they would make the contact. Q. -- call them back?</p> <p>25 with the applicants. And I believe most of the time No.</p>	
Page 31	Page 33
<p>1 that was by a phone call.</p> <p>2 Q. What would happen next?</p> <p>3 A. The interview would be scheduled. The A. Which --</p> <p>4 the applicant would report. They would go through a To hire.</p> <p>5 series of questions and answers. And then after A. To hire?</p> <p>6 that, the panel would consider everything that the Q. Yes.</p> <p>7 had -- had been put before them, and they would make Yes. After the panel -- once the -- th</p> <p>8 a recommendation as to hire or not hire to make a recommendation, then I would meet with the</p> <p>9 Q. Did you have a standard set of questions? usually.</p> <p>10 Was there a standard? Q. Did it matter if it was a decision to h</p> <p>11 A. Yes, there was. They were put together to pass on the applicant?</p> <p>12 the panel. A. Well, if -- if it was a decision to pas</p> <p>13 Q. What were those questions? an applicant, no, I wouldn't meet with them.</p> <p>14 A. I don't know what they were. Q. When you met with a person, what would</p> <p>15 Q. Do you know how many? what would, you know, be the purpose of the</p> <p>16 A. No, I do not. meeting?</p> <p>17 Q. Did you review the questions? A. Basically I would talk to them briefly,</p> <p>18 A. Yes, sometimes I did. After they were introduce myself and kind of welcome them if it</p> <p>19 interviewed, I would ask for the notes, just look at as though we were going to hire them, than</p> <p>20 look through them checking responses to various for applying and just go over some general</p> <p>21 questions. things, such as how to treat people --</p> <p>22 Q. So the -- the panel would -- was there like Uh-huh.</p> <p>23 a chairperson who met with you or the panel would A. -- how they're expected to behave. And</p> <p>24 meet with you after the interview? would also stress safety of the property and also</p> <p>25 A. Normally whoever in charge of the panel, officers. You know, that was something that</p>	

Page 34	Page 36
<p>1 did on a regular basis, and I did it with 2 applicant, particularly their driving habits. 3 Q. Uh-huh. 4 A. And I would let them know that 5 that you will be assigned will kill you 6 respect it. 7 Q. What did -- 8 A. And I did that -- I did that because 9 a deputy, a young deputy, I think in about 10 year as sheriff in a motor vehicle collision 11 Q. So you would -- you would welcome them and 12 -- and explain to them your expectations? 13 A. Pretty much, yes. Not all of my 14 expectations, but just cursory. 15 Q. Uh-huh. Your general. 16 And what would happen next? 17 A. After that, they would leave, and 18 process of gathering all of their background 19 information would begin. And once that 20 that is completed, submitted and re- -- 21 satisfactory, they would be recommended 22 Sheriff's Training and Standards. 23 Q. And that Sheriff Training and Standards 24 that's the state? 25 A. Yes.</p>	<p>1 each Q. Uh-huh. What was the training process 2 like? 3 A. The -- the BLET training? 4 Q. No, the onboarding. What was onboarding 5 like at Vance County Sheriff's Office? 6 A. Well, basically when they -- they came 7 they got hired, they were assigned to a training 8 officer for a period of weeks. I don't know exact 9 it was many weeks. The weeks varied depended on -- 10 depending on how -- how well the -- the trainee 11 adapted to the duties. 12 Some may have been a little longer than 13 my others. But none were shorter than the specified 14 period, but some may have been a little longer than 15 the specified period. 16 Q. So no specified period? 17 A. It was a specified period. But none were 18 shorter than the specified period, but some may have 19 been a little longer -- 20 of it's Q. Well -- 21 for hire to -- if the applicant had a -- you know, 22 may have had difficulty in geography or something 23 would have to -- 24 Q. What would -- 25 A. -- work with him another week, few days</p>
Page 35	Page 37
<p>1 Q. Would you say that you ran like a brotherly, 2 or sisterly organization? 3 A. No, I would not. 4 Q. Okay. So what -- what was the culture like 5 at Vance County Sheriff's Office? 6 A. To me, the culture was great. 7 along. They worked together. They took 8 together. Sometimes they may visit each other 9 duty. We -- over the years we had -- we 10 would schedule a cookout, a Christmas dinner, 11 kind of thing. But I think the -- the 12 professional one. 13 Q. And so once you recommended someone for 14 hire to training and standards, typically what 15 occurred next? 16 A. Once -- after -- once we -- when we 17 that, we would have all the information we needed 18 and then we would hire them. And basically 19 they're working their first year, if they were 20 certified, then we -- we would schedule 21 point as soon as we could to go BLET. 22 certified, then we would -- while they 23 were waiting on the paperwork to come back from the 24 Sheriff's Standards granting them their 25 certification.</p>	<p>1 Q. What was the specified period? 2 A. I don't know if it was six weeks. I was 3 six weeks. I'm -- I'm not positive. 4 Q. Repeat that answer again. 5 A. I said, I want to say six weeks. I'm not 6 positive. That's riding with a deputy and some 7 other time spent with the sergeant. Again, it may 8 differ. I'm not sure. 9 Q. Who -- who created the -- the rules relating 10 to a specified period? 11 A. I believe that was done under my 12 administration, under my tenure as sheriff. 13 Q. Let me take a step back. So in -- 14 somewhere in the hiring process HR was involved, 15 right? 16 A. The only time HR was involved is after 17 applicant was hired. Well, HR was of course involved 18 in the -- the payment. 19 Q. So I'm talking about Vance County HR. 20 A. Yes, that's what I'm talking about. I 21 would contact the HR rep and let them know I've got 22 individual that I -- I want to hire, these are 23 some of their qualifications. What can we pay them 24 Now I had a pay scale, but there was some variance</p>

Page 38	Page 40
<p>1 it.</p> <p>2 So HR would say, Well, okay, here's what we</p> <p>3 will pay them. And at that point I would let's take up with the county manager on some -- on some</p> <p>4 -- the applicant know this is what is going to be as decisions concerning pay.</p> <p>5 your pay.</p> <p>6 Q. Was -- was Vance County HR, were we -- more pay or....</p> <p>7 y'all in the same building or separate buildings? A. I was trying to get more.</p> <p>8 A. We were in an adjoining building. Q. Okay. So let's -- let's go back to this</p> <p>9 was a -- like a walkway between the two buildings, six weeks of riding with the deputy or sergeant</p> <p>10 Q. Okay. So you said you had your own practice.</p> <p>11 chart? You -- you indicated that you initiated</p> <p>12 A. No. The county has a pay scale. 12. that practice at Vance County.</p> <p>13 Q. Okay. 13 A. Because I don't know what they did before</p> <p>14 A. But -- but before I tell an applicant, the sheriff.</p> <p>15 pay, I would always verify it with HR. 15 Q. Uh-huh.</p> <p>16 Q. How is the pay calculated? Do you know A. But that was, yes, a part of, I believe</p> <p>17 that? 17 what I initiated when I became -- the actual</p> <p>18 A. I don't know. 18 documentation of the training process.</p> <p>19 Q. Is it based on years? Is it based on... Q. What did that documentation look like?</p> <p>20 A. I don't know how it's calculated. 20. Again, A. I The training officer did basically</p> <p>21 would let HR know what I had, and the director would do evaluations on the trainee on things as their dri</p> <p>22 give me the pay to offer that individual 22 skills, how they interact with people, were they</p> <p>23 Q. So when you let HR know what you had, what 23 their way around the county, were they a</p> <p>24 would you tell HR? 24 to talk on the radio properly, that type of stuff</p> <p>25 A. Something similar, as I said 25 earlier. Q. So what happened typically after the</p>	
Page 39	Page 41
<p>1 got an applicant here. They've got X number of training process?</p> <p>2 years' experience. They're certified. They've been They're -- the deputies are assigned to</p> <p>3 trained in these areas. What can we pay them? shift or a squad, as some may call it.</p> <p>4 Q. So training, the training mattered or Q. How many shifts or squads did you have?</p> <p>5 impacted pay? 5 A. I believe it was four: A, B, C and D.</p> <p>6 A. Well, sometimes it did. Sometimes it 6 Q. How were they assigned to a shift or a</p> <p>7 didn't. Same as the education level. 7 squad?</p> <p>8 Q. So did education impact pay? 8 A. Depending on where the vacancies were.</p> <p>9 A. No. 9 Q. And so would each department have their</p> <p>10 Q. Well, let's clarify that because you shift or squad? 10</p> <p>11 sometimes training did and sometimes training didn't 11 No, just -- that's just the patrol divi</p> <p>12 impact pay and same as education level. 12 And then I'm speaking of.</p> <p>13 A. Well, education level did not 13 impact pay. Q. Okay. So -- so just explain the shifts</p> <p>14 Training depending on HR could impact it 14 or was it first shift, second shift, third shift?</p> <p>15 not. 15 A. They rotated.</p> <p>16 Q. Why -- why wouldn't training 16 give me an Uh-huh.</p> <p>17 instance in which training did not impact pay. 17 A. Some worked days. Two out of the -- th</p> <p>18 A. Well, if you had a deputy with 18 say worked day shift and night shift, and they rotate</p> <p>19 three levels of training and a deputy with one, on day to night.</p> <p>20 pay may very well be the same. 20 Q. What was day shift?</p> <p>21 Q. So was there a certain threshold of 21 A. Normally there were 12-hour shifts.</p> <p>22 training? 22 Q. What were the hours?</p> <p>23 A. No. The -- the pay is determined strictly 23 I believe ordinarily they were like from</p> <p>24 by HR who sometimes would confer with the county 24 6P and 6P to 6A.</p> <p>25 manager. 25 Q. What hours did you work?</p>	

Page 42	Page 44	Page 45
<p>1 A. I did not have set hours.</p> <p>2 Q. So after they were assigned to their shift or squad, what occurred next?</p> <p>3 A. They went to work and began doing whatever it is their supervisors had them do through the chain to me, and I would forward it --</p> <p>4 Q. So they were in the supervisors' hands then?</p> <p>5 A. Yes, pretty much.</p> <p>6 Q. So the supervisor assigned the duties?</p> <p>7 A. No, they -- the supervisor just supervised them. The supervisor normally knew what the duties were, and -- and they did also. But the supervisor made sure that they performed their duties in an appropriate manner and -- and basically did what they were supposed to do.</p> <p>8 Q. Who would have -- how would the officers be assigned duties? How would duties be assigned?</p> <p>9 A. If they were on a patrol squad, their duties were to patrol the county.</p> <p>10 Q. Was there any type of document that listed the duties of, say, a patrol officer versus an investigation? Was there any type of...</p> <p>11 A. I don't think so. I don't recall any type of document that specifically spelled it out. Like I said, they patrolled -- their main job was</p>	<p>1 supervisor.</p> <p>2 their shift. And what would happen after that?</p> <p>3 A. Once that's completed, it is submitted to me, and then I would forward it to -- submit it through the chain to me, and I would forward it --</p> <p>4 A. Yes.</p> <p>5 Q. What would happen next?</p> <p>6 A. They weren't done again until the next evaluation period.</p> <p>7 Q. Okay. I think we're missing some links in the chain. Because at some point the evaluation would reach the employee, correct?</p> <p>8 A. Yes. It's going -- it's -- that is before it is submitted to me.</p> <p>9 Q. Okay.</p> <p>10 A. The immediate supervisor sits down with the employee, and they go over whatever they came up with. And at that point it makes its way through the chain to me.</p> <p>11 Q. So just for clarity or just to clarify the process, walk me through it one more time, please.</p> <p>12 A. This is a process that was in place when I was sheriff.</p> <p>13 Q. Uh-huh.</p> <p>14 If I remember correctly, there was a --</p>	<p>1 the homes, property of the citizens, their businesses and also serving various papers that were handed from the courts.</p> <p>2 Q. Okay. So the officers at some point were evaluated --</p> <p>3 A. Yes. The --</p> <p>4 Q. -- correct?</p> <p>5 A. -- performance appraisals were done.</p> <p>6 Q. Performance.</p> <p>7 Did you -- did you develop that process or that form?</p> <p>8 A. No. That was in process when I was sheriff.</p> <p>9 Q. Was it a midyear performance appraisal, or annual?</p> <p>10 A. There was a -- I believe it was a six-monthly it was annual.</p> <p>11 Q. So explain to me a little bit about that process. You said it was a midyear for new employees.</p> <p>12 A. Yes.</p> <p>13 Q. So what would happen? The employee would...</p> <p>14 A. They would be evaluated by their immediate</p>
<p>1 the homes, property of the citizens, their businesses and also serving various papers that were handed from the courts.</p> <p>2 Q. Okay. So the officers at some point were evaluated --</p> <p>3 A. Yes. The --</p> <p>4 Q. -- correct?</p> <p>5 A. -- performance appraisals were done.</p> <p>6 Q. Performance.</p> <p>7 Did you -- did you develop that process or that form?</p> <p>8 A. No. That was in process when I was sheriff.</p> <p>9 Q. Was it a midyear performance appraisal, or annual?</p> <p>10 A. There was a -- I believe it was a six-monthly it was annual.</p> <p>11 Q. So explain to me a little bit about that process. You said it was a midyear for new employees.</p> <p>12 A. Yes.</p> <p>13 Q. So what would happen? The employee would...</p> <p>14 A. They would be evaluated by their immediate</p>	<p>1 supervisor.</p> <p>2 their shift. And what would happen after that?</p> <p>3 A. Once that's completed, it is submitted to me, and then I would forward it to -- submit it through the chain to me, and I would forward it --</p> <p>4 A. Yes.</p> <p>5 Q. What would happen next?</p> <p>6 A. They weren't done again until the next evaluation period.</p> <p>7 Q. Okay. I think we're missing some links in the chain. Because at some point the evaluation would reach the employee, correct?</p> <p>8 A. Yes. It's going -- it's -- that is before it is submitted to me.</p> <p>9 Q. Okay.</p> <p>10 A. The immediate supervisor sits down with the employee, and they go over whatever they came up with. And at that point it makes its way through the chain to me.</p> <p>11 Q. So just for clarity or just to clarify the process, walk me through it one more time, please.</p> <p>12 A. This is a process that was in place when I was sheriff.</p> <p>13 Q. Uh-huh.</p> <p>14 If I remember correctly, there was a --</p>	<p>1 the homes, property of the citizens, their businesses and also serving various papers that were handed from the courts.</p> <p>2 Q. Okay. So the officers at some point were evaluated --</p> <p>3 A. Yes. The --</p> <p>4 Q. -- correct?</p> <p>5 A. -- performance appraisals were done.</p> <p>6 Q. Performance.</p> <p>7 Did you -- did you develop that process or that form?</p> <p>8 A. No. That was in process when I was sheriff.</p> <p>9 Q. Was it a midyear performance appraisal, or annual?</p> <p>10 A. There was a -- I believe it was a six-monthly it was annual.</p> <p>11 Q. So explain to me a little bit about that process. You said it was a midyear for new employees.</p> <p>12 A. Yes.</p> <p>13 Q. So what would happen? The employee would...</p> <p>14 A. They would be evaluated by their immediate</p>

<p style="text-align: right;">Page 46</p> <p>1 A. You're welcome.</p> <p>2 Q. But they were -- they were scored, never terminated someone without an investigation</p> <p>3 supervisor determined that score. Was there</p> <p>4 typically challenges to the score?</p> <p>5 A. No, not typically.</p> <p>6 Q. Was there a process by which an employee</p> <p>7 could challenge their score?</p> <p>8 A. Yes.</p> <p>9 Q. And what was that process?</p> <p>10 A. They could -- at the time of the terminated. There were some that did not require</p> <p>11 evaluation, they could let their supervisor know that. There was one individual that was</p> <p>12 they didn't agree with it. At that point, the terminated because he didn't want to work for a b</p> <p>13 come to -- try to come to some kind of what Sheriff. That did not re- -- he made the stateme</p> <p>14 happy medium. And afterwards the individual would not require investigation.</p> <p>15 asked to sign the appraisal just acknowledging that.</p> <p>16 it had been done in his or her presence along with.</p> <p>17 them before it comes to me. And if they could object but that was prior to my arrival. Well,</p> <p>18 that, then it would come to me. really -- he really wasn't terminated. He just</p> <p>19 Q. Okay. So let's -- let's talk about the -- sworn in when I got there, is the way it e</p> <p>20 the process, the termination process. Explain to me</p> <p>21 what that process would look like.</p> <p>22 A. Well, there's really not a termination A. Yes.</p> <p>23 process.</p> <p>24 Q. So if you wanted to terminate an employee</p> <p>25 -- have -- have you terminated employees other than</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. So you -- are you testifying that you h</p> <p>2 A. No, I'm not saying never. I'm saying a</p> <p>4 terminations during my tenure just require</p> <p>5 investigation depending on the actions.</p> <p>6 Q. Can you give me an example of a termina</p> <p>7 that did not require an investigation, or please</p> <p>8 me an example.</p> <p>9 A. It's -- there have been several people</p> <p>10 terminated. There were some that did not require</p> <p>11 investigation. There was one individual that was</p> <p>12 terminated because he didn't want to work for a b</p> <p>13 what Sheriff. That did not re- -- he made the stateme</p> <p>14 individual would not require investigation.</p> <p>15 Q. Who did he make that statement to?</p> <p>16 A. He made it to the majority of the sheri</p> <p>17 Sheriff, but that was prior to my arrival. Well,</p> <p>18 really -- he really wasn't terminated. He just</p> <p>19 sworn in when I got there, is the way it e</p> <p>20 Q. So you chose not to swear him in?</p> <p>21 A. Yes.</p> <p>22 Q. How did you learn of that statement?</p> <p>23 As I said, basically it was made in fro</p> <p>24 anybody in the sheriff's office, and it came</p> <p>25</p>
<p style="text-align: right;">Page 47</p> <p>1 Mr. White?</p> <p>2 A. Yes.</p> <p>3 Q. And what procedure did you employ? terminated -- termination?</p> <p>4 A. Well, it depends on the reason for</p> <p>5 termination. Generally if warranted, there was some</p> <p>6 kind of investigation done. But it didn't</p> <p>7 necessarily require an investigation to terminate</p> <p>8 employee depending on the reason.</p> <p>9 Q. Okay. So -- so give me an example of a</p> <p>10 reason that did require an investigation?</p> <p>11 A. There could be allegations that we need to</p> <p>12 look into that would require an investigation what if because I could or what --</p> <p>13 something happened openly that was egregious enough,</p> <p>14 that would require an investigation.</p> <p>15 Q. What -- what would be an egregious</p> <p>16 example?</p> <p>17 A. If a deputy just stood in the front door</p> <p>18 and cussed out everybody he saw, and if</p> <p>19 my command staff heard it, I don't see</p> <p>20 an investigation.</p> <p>21 Q. Okay. So let's -- let's -- let's get</p> <p>22 hypothetical.</p> <p>23 But can you give me an example of when you</p> <p>24 terminated someone without an investigation?</p> <p>25 A. No, I cannot.</p>	<p style="text-align: right;">Page 49</p> <p>1 me.</p> <p>2 Q. Okay. And that was a no questions aske</p> <p>3 terminated -- termination?</p> <p>4 A. I just didn't swear him in.</p> <p>5 Q. Okay. Can you think of a situation whe</p> <p>6 you just terminated someone, sent the document,</p> <p>7 termination document?</p> <p>8 A. No. Not without cause, no.</p> <p>9 Q. No. I'm not saying that it had -- did</p> <p>10 did not have cause. I'm just asking for an exam</p> <p>11 A. Have I just -- just terminated someone,</p> <p>12 what if because I could or what --</p> <p>13 Q. No, no, no. Without an investigation.</p> <p>14 A. Not that I recall, no, other than the</p> <p>15 individual we are speaking of. And, again, that</p> <p>16 just not swearing him in.</p> <p>17 Q. Right. Well, you know, you -- you just</p> <p>18 testified that you have terminated individuals</p> <p>19 without an investigation. And -- and I'm just tr</p> <p>20 to get an example of a situation in which --</p> <p>21 A. Well, in this case I misspoke. It wasn</p> <p>22 -- technically it wasn't a termination.</p> <p>23 Q. Okay.</p> <p>24 A. I just didn't swear -- re-swear him in.</p> <p>25 worked for the previous sheriff. I just didn't s</p>

Page 50	Page 52
<p>1 him in when I took over.</p> <p>2 Q. Okay. Well, give me an example of when you</p> <p>3 terminated someone with an investigation, please.</p> <p>4 A. I -- I don't recall that. I spent 12 years MS. ROBINSON: Are you instructing him</p> <p>5 as sheriff, and there were some people terminated to answer the question?</p> <p>6 but I don't recall all the specifics in that. But MR. GEIS: Yes, I am. He's already</p> <p>7 there were investigations prior to termination, or answered it. Do you have another question?</p> <p>8 investigation.</p> <p>9 Q. Sheriff White, it -- it may be time for a</p> <p>10 break. But we have called you here to testify on</p> <p>11 behalf of the Vance County Sheriff Office. And so</p> <p>12 it's imperative that you provide examples and</p> <p>13 because you're speaking on behalf of that entity. Q. Sheriff White, explain to me your</p> <p>14 And I'm just trying to get an understanding of the termination process.</p> <p>15 that office was run, how it hired people, how it A. Well, as I said earlier, technically th</p> <p>16 fired people. And, you know, this is an employment termination process per se.</p> <p>17 discrimination case. So it would -- if you need a</p> <p>18 break -- if you ever need a break, just say. process change based on the individual?</p> <p>19 A. Go ahead.</p> <p>20 MR. GEIS: Are you finished testifying? Q. Is</p> <p>21 there a question on the table for the sheriff A. There's not a termination process.</p> <p>22 answer?</p> <p>23 MS. ROBINSON: There was a question. Q. Well, explain to me how a person is</p> <p>24 MR. GEIS: What is the question? A. Well, it depends on what they've done.</p> <p>25 BY MS. ROBINSON: investigation is conducted. A decision is made.</p>	<p>1 transcript. So, Sheriff, just wait for her</p> <p>2 question, and you can answer it. You've already</p> <p>3 answered this question.</p> <p>4 MS. ROBINSON: Are you instructing him</p> <p>5 to answer the question?</p> <p>6 MR. GEIS: Yes, I am. He's already</p> <p>7 answered it. Do you have another question?</p> <p>8 MS. ROBINSON: So you're instructing him</p> <p>9 to answer the question?</p> <p>10 MR. GEIS: Do you have another question?</p> <p>11 MS. ROBINSON: I do.</p> <p>12 BY MS. ROBINSON:</p> <p>13 Q. Sheriff White, explain to me your</p> <p>14 termination process.</p> <p>15 A. Well, as I said earlier, technically th</p> <p>16 termination process per se.</p> <p>17 Q. So do you make up the pro -- does the</p> <p>18 process change based on the individual?</p> <p>19 A. There's not a process as I see it.</p> <p>20 Q. Uh-huh. Well --</p> <p>21 A. There's not a termination process.</p> <p>22 Q. Well, explain to me how a person is</p> <p>23 terminated?</p> <p>24 A. Well, it depends on what they've done.</p> <p>25 investigation is conducted. A decision is made.</p>
Page 51	Page 53
<p>1 Q. The question is that I want -- do you feel</p> <p>2 comfortable letting me know when you need a break?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Do you need a break now?</p> <p>5 A. No, not now.</p> <p>6 Q. So can you provide me an example of when</p> <p>7 you terminated someone and actually conducted an</p> <p>8 investigation?</p> <p>9 A. No, I cannot. I don't recall</p> <p>10 individual that was terminated over a 10 year</p> <p>11 period.</p> <p>12 Q. Can you recall one instance?</p> <p>13 A. The one that we talked about earlier, which</p> <p>14 technically was not a termination.</p> <p>15 Q. The instance we discussed earlier was one</p> <p>16 without an investigation. My question is can you</p> <p>17 recall one instance in which --</p> <p>18 MR. GEIS: Objection, asked and answered.</p> <p>19 And I believe this lawsuit is one of those</p> <p>20 instances. So....</p> <p>21 MS. ROBINSON: I think that's</p> <p>22 objection.</p> <p>23 MR. GEIS: Which you're familiar with A. It depends on their behavior. Normally</p> <p>24 because I read a number of them in your they -- we would inform them that their services</p> <p>25 deposition of Justin White when I reviewed the</p>	<p>1 warrants termination, they're terminated.</p> <p>2 Q. What does the investigation consist of?</p> <p>3 A. It depends on the particular situation</p> <p>4 particular incident or allegations. Normally it'</p> <p>5 interviewing everybody that we can that were</p> <p>6 involved.</p> <p>7 Q. So you would conduct interviews?</p> <p>8 A. Yes. They would be conducted, not</p> <p>9 necessarily by me.</p> <p>10 Q. What would occur during the interviews?</p> <p>11 A. Well, I wouldn't be present during the</p> <p>12 interviews, but I'm sure whatever questions that</p> <p>13 earlier, which to be relevant would be asked.</p> <p>14 Q. And what would happen next?</p> <p>15 Investigation would proceed. And at th</p> <p>16 conclusion of the investigation, some type of</p> <p>17 recommendation would be made. If the investigati</p> <p>18 concluded that a termination would be necessary,</p> <p>19 that person may be terminated.</p> <p>20 Q. How would the termination be executed?</p> <p>21 A. It depends on the -- the individual.</p> <p>22 Q. What does that mean?</p> <p>23 A. It depends on their behavior. Normally</p> <p>24 they -- we would inform them that their services</p> <p>25 would no longer be needed, and we would collect the ID and</p>

Page 54	Page 56
<p>1 weapon and that type of stuff at that time.</p> <p>2 within the sheriff's office will drive that person</p> <p>3 home or wherever they need to go, and then we would</p> <p>4 collect the car and that kind of stuff.</p> <p>5 Q. Would the termination be effective</p> <p>6 immediately typically or....</p> <p>7 A. Yes, immediately. Yes.</p> <p>8 Q. So let's go back to the example that you</p> <p>9 provided about, you know, not swearing in the -- the</p> <p>10 white deputy.</p> <p>11 A. I didn't -- now I did not say</p> <p>12 white.</p> <p>13 Q. Well, he wa- -- what was his</p> <p>14 a good point. So what was his race?</p> <p>15 A. He was white.</p> <p>16 Q. He was white.</p> <p>17 A. Caucasian.</p> <p>18 Q. Okay. How -- so you said you</p> <p>19 swear him in?</p> <p>20 A. No, I did not.</p> <p>21 Q. So he just -- he just didn't</p> <p>22 work the next day?</p> <p>23 A. No. He couldn't unless he was</p> <p>24 he was not sworn in, he was no longer a</p> <p>25 Again, he was under the previous sheriff</p>	<p>1. employee, correct?</p> <p>2. A. Yes.</p> <p>3. Q. Explain to me what -- what is done after</p> <p>4 you effectuate and communicate the termination.</p> <p>5 A. Now which document is....</p> <p>6 Q. The termination notice.</p> <p>7 A. Well, there's one that goes to HR.</p> <p>8 Q. Uh-huh.</p> <p>9 And there's another one that goes to</p> <p>10 Sheriff Training and Standards.</p> <p>11 A. Q. Explain to me the -- the process by which</p> <p>12 the one that goes to HR is completed.</p> <p>13 That's It's just -- has the individuals date --</p> <p>14 mean the individual's name and the date that they</p> <p>15 were terminated.</p> <p>16 Q. Is that a document that you complete?</p> <p>17 A. Yes.</p> <p>18 Q. Do you decide --</p> <p>19 MS. ROBINSON: So let the record reflect</p> <p>20 that we have on the screen, which is Exhibit 1.</p> <p>21 EXHIBIT NUMBER 10 WAS MARKED FOR IDENTIFICATION</p> <p>22 BY MS. ROBINSON:</p> <p>23 Q. Is this the document you're referring to</p> <p>24 Sheriff White?</p> <p>25 A. Yes. It's called a Personnel Action</p>
Page 55	Page 57
<p>1 Q. So all deputies have to be sworn in under</p> <p>2 new leadership?</p> <p>3 A. Yes, and after each election.</p> <p>4 Q. Did you send him a letter or a</p> <p>5 anything?</p> <p>6 A. Yes. He was sent a letter.</p> <p>7 Q. What did the letter say?</p> <p>8 A. I believe it said his services were no</p> <p>9 longer needed.</p> <p>10 Q. Did that deputy contact HR?</p> <p>11 A. I don't know.</p> <p>12 Q. Did that deputy file a -- a grievance</p> <p>13 or....</p> <p>14 A. Not that I know of.</p> <p>15 Q. Did you ever hear from that deputy again?</p> <p>16 A. No.</p> <p>17 MS. ROBINSON: Can we -- let me take a</p> <p>18 five-minute break.</p> <p>19 MR. GEIS: Okay.</p> <p>20 (BREAK TAKEN)</p> <p>21 BY MS. ROBINSON:</p> <p>22 Q. Sheriff -- Sheriff White, we</p> <p>23 talking about the termination process.</p> <p>24 know, just to move things some -- along</p> <p>25 is a document that you complete when you</p>	<p>2 Q. Can you review that document? Let's go</p> <p>3 him -- you a second to review that document.</p> <p>4 MS. ROBINSON: Michael, can you scroll</p> <p>5 is that the full document?</p> <p>6 MR. MCGURL: (Complies.)</p> <p>7 MR. GEIS: Are you sure you want to label</p> <p>8 this as Exhibit 1? The rules require that</p> <p>9 exhibits in a case in the Eastern District be</p> <p>10 labeled sequentially regardless of whether</p> <p>11 they're in another deposition. I -- I don't</p> <p>12 a problem with it. It's your call. I'm just</p> <p>13 letting you know.</p> <p>14 MS. ROBINSON: No. The exhibits --</p> <p>15 COURT REPORTER: I'm sorry.</p> <p>16 MR. GEIS: You need to what?</p> <p>17 MS. ROBINSON: It's Exhibit 10.</p> <p>18 MR. GEIS: That was not among -- we --</p> <p>19 can read that. Can you read that, Sheriff?</p> <p>20 THE WITNESS: Let me stand up and get a</p> <p>21 little closer to it.</p> <p>22 MR. GEIS: That was not among the documents</p> <p>23 And, you that we have this morning.</p> <p>24 some, there Oh, Sheriff, here it is. But it was among</p> <p>25 terminate an documents yesterday.</p>

Page 58	Page 60
<p>1 MS. ROBINSON: Right. Some of the 2 documents -- can we go off the record? 3 MR. GEIS: Well, I've -- I've got it right 4 here. I'll give it to him, Exhibit 410. I would consider the main two. 5 MS. ROBINSON: Yeah. We sent an e-mail 6 saying that some of the documents will be terminated? 7 yesterday will be used today. 8 MR. GEIS: Yes. I've got it. 9 THE WITNESS: Yes, I see this. 10 BY MS. ROBINSON: 11 Q. So you reviewed the document? 12 A. Yes. 13 Q. Do you recognize the document? 14 A. Yes. 15 Q. And can you explain for the record what 16 this document is? 17 A. Well, it's called a Payroll Addition Form. 18 And it basically is just letting human resources know 19 that this particular individual is no longer on the 20 payroll. 21 Q. And you complete that document whenever you 22 terminate an employee? 23 A. Yes, and also when an employee leaves for 24 any other reason. 25 Q. How soon after a termination</p>	<p>1 the completed when an officer is terminated? 2 A. I know these two are, but I don't recall 3 got it right document that is submitted. But these are 4 410. I would consider the main two. 5 Q. Okay. Do you send letters to employees 6 will be terminated? 7 A. Sometimes. Sometimes we don't. 8 Q. Do you provide reasons for termination? 9 A. At times we do. Other times we don't. 10 Q. Why -- why would you not provide an 11 explanation? 12 A. Generally if someone is terminated, the 13 know why. Oftentimes we as sheriffs just tell them 14 their services are no longer needed. 15 Q. Can you give me an example of when you 16 provide a reason for termination? 17 A. No, I cannot. I don't recall a specific 18 example. 19 MS. ROBINSON: Michael, can you take the 20 document down, please? 21 MR. MCGURL: (Complies.) 22 BY MS. ROBINSON: 23 Q. Well, please give me some examples for 24 reasons or reasons that you've terminated employees 25 your deputies in your tenure.</p>
Page 59	Page 61
<p>1 complete this document? 2 A. We do it as soon as possible, sometimes the 3 next the day or next couple of days. 4 Q. Okay. So you mentioned a document that you 5 send to Training and Standards also. How soon after 6 termination do you complete that document? 7 A. Sheriff Standards has a rule, and it says 8 it says ten days. I'm not certain. 9 Q. Can you review this document, Sheriff White, 10 that we have on the screen? 11 A. Okay. 12 Q. Can you tell me what this document is? 13 A. It's a report of separation. 14 Q. And do you recognize your signature on this 15 document? 16 A. Yes. 17 MS. ROBINSON: Let the record reflect that 18 we are marking what is Exhibit form 11 19 (EXHIBIT NUMBER 11 WAS MARKED FOR IDENTIFICATION.) 20 BY MS. ROBINSON: 21 Q. How soon after termination do you complete 22 this form generally? 23 A. I believe Sheriff Standards says within ten 24 days, if I'm not mistaken. 25 Q. Are these the only documents that are</p>	<p>1 A. That is something that I would have to 2 reflect on because that was a period of 12 years, 3 I don't recall everybody that was terminated nor 4 why they were terminated. 5 So, Sheriff White, I -- I don't want you 6 I don't need you to recall every one, just a few 7 examples if you could provide. 8 A. No, I cannot. 9 Q. Do you know how many people you've 10 terminated over your tenure? 11 A. No, I do not. 12 Q. Would you say it's less than ten? 13 A. I don't know. I haven't counted them. 14 How many people did you terminate, say, 15 your last year of service? 16 A. I don't know. 17 Q. Did you terminate any individuals your 18 year of service? 19 I know one was terminated. 20 Q. What was that individual terminated for? 21 A particular event that occurred that he 22 was involved in. 23 Q. What was that particular event? 24 A. It was a use of force and the ensuing 25 actions after the use of force, actually before a</p>

Page 62	Page 64
<p>1 after.</p> <p>2 Q. Was someone injured?</p> <p>3 A. Yes.</p> <p>4 Q. Was the person injured?</p> <p>5 A. Excuse me?</p> <p>6 Q. I said, was that person injured?</p> <p>7 A. They suffered a broken arm.</p> <p>8 Q. Are you talking about Mr. White?</p> <p>9 A. Yes.</p> <p>10 Q. Was that the only termination</p> <p>11 last year of service?</p> <p>12 A. That's the only one I recall</p> <p>13 moment.</p> <p>14 Q. What about your -- the year prior</p> <p>15 last year? Did you terminate....</p> <p>16 A. I don't recall that.</p> <p>17 Q. You -- you said that you had a</p> <p>18 which you -- you invited your employees</p> <p>19 cookouts?</p> <p>20 A. Yes. At times during my early</p> <p>21 sheriff, we would hold cookouts, all the</p> <p>22 invited. We would do a Christmas dinner</p> <p>23 employees invited and some of the county</p> <p>24 county manager and other people to cook</p> <p>25 prior EMS personnel, police officers.</p>	<p>1 BY MS. ROBINSON:</p> <p>2 Q. You can answer.</p> <p>3 What type of songs would he sing?</p> <p>4 A. Are you talk -- would who? Are you tal</p> <p>5 about the county manager or --</p> <p>6 Q. You -- you said the --</p> <p>7 A. -- the deputy?</p> <p>8 Q. The deputy.</p> <p>9 A. He would -- he would just sing like may</p> <p>10 during your song or something like that. He would -</p> <p>11 wouldn't -- he would never do the whole song. He</p> <p>12 would just do snippets, Christmas songs, that typ</p> <p>13 stuff.</p> <p>14 Q. Did you continue that practice?</p> <p>15 A. It went on for a while. I don't know t</p> <p>16 exact number of years we did it, but eventually -</p> <p>17 culture in</p> <p>18 Q. Why did it stop?</p> <p>19 A. Well, if we served chicken, some people</p> <p>20 for years steak. If we served steak, somebody wante</p> <p>21 lemonades. If we served tea, somebody wanted</p> <p>22 all-encompassing. And I just -- I didn't feel that it wa</p> <p>23 staff really appreciated. So we just didn't do it. Yo</p> <p>24 out, know we did it for several years. I don't recal</p> <p>25 was the exact number.</p>
Page 63	Page 65
<p>1 like a -- similar to just a good social</p> <p>2 We just -- we just got together, ate, talked</p> <p>3 whatever; and then everybody went on their</p> <p>4 Q. Were they at the facility or at your home</p> <p>5 or....</p> <p>6 A. No, we -- normally we would --</p> <p>7 cookouts at one of the -- at the local</p> <p>8 We would get a space at a local hotel and</p> <p>9 Christmas dinner. We had music, food.</p> <p>10 just enjoyed themselves.</p> <p>11 Q. Okay. What kind of music did</p> <p>12 A. Well, the county manager norma</p> <p>13 play the piano. Well, the -- the former</p> <p>14 manager would play the piano for us. We</p> <p>15 that at that time that liked to sing, and</p> <p>16 tell jokes. He was actually in charge</p> <p>17 bailiffs.</p> <p>18 Q. So he would sing with the piano</p> <p>19 A. No. He would do his own thing</p> <p>20 do impersonations and stuff like that.</p> <p>21 Q. Did y'all play soul music?</p> <p>22 A. No. It was just piano.</p> <p>23 Q. The piano.</p> <p>24 What type of songs would he sing?</p> <p>25 MR. GEIS: Objection, relevant</p>	<p>1 gathering Q. What -- what types of events did you --</p> <p>2 you do to -- did you do any events to replace tho</p> <p>3 types of events, those types of gatherings?</p> <p>4 No. That was just done within the</p> <p>5 sheriff's office. And at some point the county w</p> <p>6 we did an annual event, a dinner, and all the employe</p> <p>7 were invited.</p> <p>8 Q. You -- you testified earlier that you</p> <p>9 thought those events, you know, helped the office</p> <p>10 bond, correct?</p> <p>11 A. That I thought -- no, I didn't say that</p> <p>12 I thought it helped them bond. It was just a -- it</p> <p>13 court to -- we invited EMS and police officers at</p> <p>14 had a deputy patrol. It was law enforcement, EMS, fir</p> <p>15 responders' deal, along with the sheriff's office</p> <p>16 the people as well as the jail.</p> <p>17 Q. Did you host any events or any activiti</p> <p>18 for the sheriffs alone, the sheriff's deputies?</p> <p>19 He would No.</p> <p>20 Q. Was there an effort to ensure that the</p> <p>21 deputies built relationships with one another?</p> <p>22 A. Well, that was up to each individual's</p> <p>23 supervisors, but most of our deputies -- our depu</p> <p>24 were mature people. And nobody had to, you know,</p> <p>25 to see that they bonded or that type of thing. I</p>

Page 66	Page 68
<p>1 automatically looked out for each other. 2 Q. What -- what does that mean, they 3 automatically looked -- 4 A. I mean, normally in the law enforcement 5 community law enforcement officers generally eat 6 together. They know each other. They may visit each 7 other's homes, that type of thing. They would know 8 each other's kids, spouse's name. 9 MS. ROBINSON: Okay. We are about to go 10 into a dr- -- Chris, we are about to go into 11 these policies. Do you want to break for lunch? 12 MR. GEIS: It's up to you. We 13 think Sheriff White would like a break 14 lunch, but it's up to you when to take 15 MS. ROBINSON: Sheriff White, are you ready 16 for lunch? 17 THE WITNESS: It doesn't matter to me. 18 MS. ROBINSON: Okay. Well, it's 12:30 19 So, you know, I can eat lunch late 20 to make sure the sheriff is comfortable. 21 MR. GEIS: Sure, whenever. 22 THE WITNESS: Okay. Yeah. Let's 23 -- let's do lunch. 24 MS. ROBINSON: Okay. So, what 25 MR. GEIS: Sure.</p>	<p>1 or you said captain? A. Captain. 3 Q. Yeah. A. Captain. Yeah. Weldon Bullock. COURT REPORTER: Captain, what was that THE WITNESS: Weldon Bullock. COURT REPORTER: Could you just -- 8 MS. ROBINSON: Your microphone is very 9 sensitive. We have the texts. 10 MR. GEIS: Sorry. 11 MS. ROBINSON: 12 Q. Okay. Can you -- you continue, Sheriff 13 White? 14 A. It depends on the -- what type of compl 15 are you ready. If it's something that warrants an 16 internal investigation, then generally Captain We 17 Bullock will conduct it. 18 Q. And so that's a citizen's complaint. W 19 But about a workplace complaint? 20 A. Such as? 21 Q. Harassment, discrimination, hostile wor 22 environment. 23 A. We've only had one that I recall during 24 my time as sheriff. 25 Q. And how were those -- how was -- so --</p>
Page 67	Page 69
<p>1 MS. ROBINSON: Okay. 2 MR. GEIS: I'll see you at 1:30. 3 (LUNCH BREAK) 4 BY MS. ROBINSON: 5 Q. Sheriff White, we left off discussing 6 certain practices that were employed. Let's talk 7 about the -- the process in how you handled 8 complaints of harassment, discrimination, any type of 9 workplace complaint. Can you explain to me that 10 process? 11 A. It would depend on how the complaint 12 in, whether it be a letter or phone or 13 And that is generally -- depending on the 14 it could be assigned to an investigator 15 serious complaint. If somebody comes in 16 want to know why your deputy was speeding 17 on I-85, you know, that, in my opinion, 18 require an investigation. You know, we 19 we would talk to the deputy if we can figure out who 20 it was and, you know, kind of go from there. If 21 was something major, then, yes, it would 22 investigation done generally by -- depending 23 complaint again. Generally we would -- 24 investigation would be done by Captain 25 Q. What's the last name? I'm sorry. Cappy --</p>	<p>1 -- and I suspect we're talking about Mr. White. A. Yes. 3 Q. So did you anticipate, have a -- a prac 4 of like if a complaint came through, how you would 5 respond to it, a procedure? A. No, we didn't -- I wouldn't say we 6 anticipated. Again, that's the only complaint th 7 in my tenure as sheriff the way you 8 described it. 9 Q. Well, did -- so how would you com- -- h 10 you ever had a situation in which a woman said th 11 she wasn't treated the same as men, male deputies 12 at, No. 13 Q. Okay. And so not had any workplace 14 complaints in terms of -- what if a officer said, 15 yes someone is harassing me, an employee, a co- -- a 16 deputy is harassing me or -- maybe not even those 17 words, but.... 18 We -- we've only had one such incident 19 here. Similar to that. 20 Q. Okay. I think at this point we want to 21 look at -- go into the policies. 22 MS. ROBINSON: Michael, can you please 23 the internal up A.1 and A.2? 24 Bullock. 25 MR. MCGURL: (Complies.)</p>

Page 70	Page 72
<p>1 BY MS. ROBINSON:</p> <p>2 Q. Sheriff White, can you see this policy?</p> <p>3 A. Yes, I can see it, but I would have to walk up there and read it.</p> <p>4 Q. Okay. I think Mr. Geis is pulling that together for you.</p> <p>5 Sheriff White, will you please let me know when you've had a chance to review that policy?</p> <p>6 A. Any particular section or the entire policy?</p> <p>7 Q. The policy in its entirety.</p> <p>8 A. Okay.</p> <p>9 Q. Do you recognize that document, Sheriff White?</p> <p>10 A. It looks to be a policy and procedure manual.</p> <p>11 Q. Can you identify the document by name?</p> <p>12 A. That is Directive A.1, "Cannon Ethics."</p> <p>13 Q. And are those your signatures on that document?</p> <p>14 A. Yes.</p> <p>15 Q. Did you draft these policies?</p> <p>16 A. No, I did not draft them.</p> <p>17 Q. Were you responsible for the drafting of these policies?</p>	<p>1 Q. Okay. How often are you required to update policies?</p> <p>2 I'm not aware of a requirement as far as updating policy, a timeline.</p> <p>3 Q. Did you have someone who was dedicated to drafting policies, updating and implementing policies?</p> <p>4 A. No.</p> <p>5 Q. Did you provide your deputies with copies of your policies?</p> <p>6 A. They were not provided with copies of the policy manual on an individual basis, but they did have access to it. There was a computer in the patrol squad room that they can sit down whenever they wanted to and review whatever policies they chose to.</p> <p>7 Q. Why didn't you provide your deputies with copies of the policy?</p> <p>8 A. Vance County, being a poor county, we just couldn't afford to print 40-something-thick policy manuals.</p> <p>9 Q. Okay. So I want to turn your attention to the actual exhibit, and I'm going to ask you a couple of questions about it.</p> <p>10 Can you read the primary responsibility of Article 1?</p>
Page 71	Page 73
<p>1 A. Yes.</p> <p>2 Q. If you would go to the first page of Directive A.1, please.</p> <p>3 A. (Complies.)</p> <p>4 Q. Can you read the date of this policy?</p> <p>5 A. 7/15/2009.</p> <p>6 Q. How often did you update your policy, essentially, Sheriff White?</p> <p>7 A. I believe there was only one update that I recall during my tenure since this was drafted.</p> <p>8 MS. ROBINSON: And let the record reflect that we're marking Exhibit 12, which is Directive A.1. (EXHIBIT NUMBER 12 WAS MARKED FOR IDENTIFICATION.)</p> <p>9 BY MS. ROBINSON:</p> <p>10 Q. You were saying that there was only one update?</p> <p>11 A. That I can recall.</p> <p>12 Q. When did that update occur?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you -- do you know about -- not precisely when, but was it in 2008, 2009 or after?</p> <p>15 A. I don't know. It would have been after this July 15, 2009 date.</p>	<p>1 A. "The primary responsibility of the police service and the individual officer is the protection of the people of the United States through the upholding of their laws; chief among them is the Constitution of the United States and its Amendments."</p> <p>2 The law enforcement officer always represents the whole of the community and its legally expressed and is never the arm of any political party or organization.</p> <p>3 Q. Do you agree with that statement?</p> <p>4 A. Yes, I agree with it.</p> <p>5 Q. What does that statement mean to you?</p> <p>6 A. It means exactly what it says to me.</p> <p>7 Q. Which is? If you paraphrase it -- can you paraphrase that statement in your -- in layman's terms?</p> <p>8 A. Do the right thing.</p> <p>9 Q. Okay. I would like for you to turn your attention to Article 6.</p> <p>10 A. Okay.</p> <p>11 Q. Can you just review that statement to yourself? I'm not going to have you read the entire paragraph.</p> <p>12 A. (Complies.)</p>

Page 74	Page 76
<p>1 Q. After you've reviewed that statement, will you tell me what that means? Just summarize it in your terms.</p> <p>2 A. Basically be a decent, respectful person and lead your life in a manner such as that.</p> <p>3 Q. Would you agree that that's on your duty?</p> <p>4 A. Yes.</p> <p>5 Q. Will you pay -- will you turn your attention to Article 7?</p> <p>6 A. Okay.</p> <p>7 Q. Can you paraphrase that for me?</p> <p>8 A. Basically serving the public in a professional manner.</p> <p>9 Q. There is a sentence there. It says -- so the second sentence from the last that sentence, sir?</p> <p>10 A. Are you talking about the one that says that it does not give satisfaction privately?</p> <p>11 Q. No. So we're still in Article 7.</p> <p>12 A. Okay.</p> <p>13 Q. And it says, "The officer will give service -- where he can and require compliance with the law."</p>	<p>1 MR. ROBINSON:</p> <p>2 Sheriff White, will you please let me know when you've had a chance to review this directive.</p> <p>3 A. The entire directive?</p> <p>4 Q. If you want to skim it, we'll go through it part by part like before, or if you want to read it review it in its entirety, either works.</p> <p>5 A. Okay.</p> <p>6 Q. Can you identify this document, Sheriff White?</p> <p>7 A. It looks to be from the Vance County Sheriff's Offices Policy and Procedure Manual.</p> <p>8 Q. What directive is this?</p> <p>9 A. B.6.</p> <p>10 And can you read the name of the document at the bottom of each page? What does it say at the bottom of each page?</p> <p>11 A. Vance County Sheriff's Office Policy and Procedure Manual.</p> <p>12 Q. And is it -- this your signature on the policies?</p> <p>13 A. Yes.</p> <p>14 Q. Did you draft this policy?</p> <p>15 A. No, I did not.</p> <p>16 Q. Did you sign off on this policy?</p>
Page 75	Page 77
<p>1 Q. What does that mean?</p> <p>2 A. He will give service where he can in serving the public and require compliance with the law.</p> <p>3 Q. Does that sentence mean that the officer is expected to uphold the laws?</p> <p>4 A. Yes.</p> <p>5 Q. Can you turn to the -- to the "Code of Ethics," Sheriff White?</p> <p>6 A. Okay.</p> <p>7 Q. Is this a document that you had each officer sign?</p> <p>8 A. No, they would not have -- I don't believe they would each sign this particular directive.</p> <p>9 Q. But you did expect the officers to act as directed under this code of ethic?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So if you -- you'll hold onto it, we'll come back to this -- these policies. Let's turn now to the domestic violence Directive B-6.</p> <p>12 MS. ROBINSON: Do you have that policy, Mr. Geis?</p> <p>13 MR. GEIS: Yes, we do.</p> <p>14 THE WITNESS: I have it.</p>	<p>1 A. Yes.</p> <p>2 Q. Can you go to the first page of the policy document?</p> <p>3 A. Okay.</p> <p>4 Q. Okay. And can you read the effective date?</p> <p>5 A. 7/15/2009.</p> <p>6 Q. Has this policy been updated since?</p> <p>7 A. It's been updated once. I don't recall the date.</p> <p>8 Q. Who updated the policy?</p> <p>9 A. I did.</p> <p>10 Q. Do you know who drafted the policy?</p> <p>11 A. It was drafted by a company or a group of this type of work.</p> <p>12 Q. Do you recall the name of the group?</p> <p>13 A. No, I do not.</p> <p>14 Q. If you will turn to the -- so first page of the policy and read the second sentence for me.</p> <p>15 A. "The Vance County Sheriff's Office recognizes domestic incidents caused as high priority, needing special attention due to the possibility of violence directed to an involved party."</p> <p>16 Q. Did your office receive a lot of domestic disputes?</p>

Page 78	Page 80
<p>1 A. We received some. I don't recall how many. July 15, 2009.</p> <p>2 Q. Will you turn your attention to -- your Q. Has this policy been updated?</p> <p>3 attention to page 7 of that document, Article 5? Can Once that I recall.</p> <p>4 you read that?</p> <p>5 A. Which section on page 7?</p> <p>6 Q. Article 5.</p> <p>7 A. "Same Gender Disputes"?</p> <p>8 Q. Yes.</p> <p>9 A. "Although 50B does not address 9 member -- every officer of the sheriff's office</p> <p>10 specifically, the issue of same-sex domestic should have received one. I believe a memo went</p> <p>11 incidents, deputies are reminded that domestic along with it, if I remember correctly.</p> <p>12 disputes do occur with same-sex relationships. Q. Do you recall what the memo may have sa</p> <p>13 Personnel are to treat calls of this nature the would have said?</p> <p>14 way in using the same methods as opposite-sex calls. A. No, I don't remember, but it would have</p> <p>15 However, do not apply the same standards for said identified the policy that was updated.</p> <p>16 orders under 50B if making a warrantless arrest." Q. Would you have e-mailed that update or.</p> <p>17 Q. Can you explain to me what last sentence. A. No. I believe it was hand-delivered.</p> <p>18 means?</p> <p>19 A. I'm not 100 percent sure, but I'm the policy as the entire Vance County Sheriff's</p> <p>20 that it means -- apply the same standard 20 -- Office Policy Manual or are you saying this direc</p> <p>21 distinguishing a difference between same-sex was updated?</p> <p>22 opposite sex. You don't apply the same rules. A. No. I'm not saying this directive. It</p> <p>23 Q. Why wouldn't you apply the same rules? A. Particular directive, but I don't recall which</p> <p>24 A. I don't know. That's just what it is.</p> <p>25 Q. And you expected your deputies to carry out Okay. Can you read the -- the -- start</p>	<p>1 A. Yes.</p> <p>2 Q. Did you disseminate the updated policy?</p> <p>3 A. Yes.</p> <p>4 Q. To whom did you give it to?</p> <p>5 A. I believe every deputy received a copy</p> <p>6 the updated portion. In fact, every -- every</p> <p>7 member -- every officer of the sheriff's office</p> <p>8 should have received one. I believe a memo went</p> <p>9 along with it, if I remember correctly.</p> <p>10 Q. Do you recall what the memo may have sa</p> <p>11 the would have said?</p> <p>12 A. No, I don't remember, but it would have</p> <p>13 identified the policy that was updated.</p> <p>14 Q. Would you have e-mailed that update or.</p> <p>15 A. No. I believe it was hand-delivered.</p> <p>16 Q. When you updated the policy, did you up</p> <p>17 the policy as the entire Vance County Sheriff's</p> <p>18 Office Policy Manual or are you saying this direc</p> <p>19 was updated?</p> <p>20 A. No. I'm not saying this directive. It</p> <p>21 Particular directive, but I don't recall which</p> <p>22 it is.</p> <p>23 Okay. Can you read the -- the -- start</p>
Page 79	Page 81
<p>1 your policies, correct?</p> <p>2 A. Yes, I did.</p> <p>3 Q. Okay. Let's move on to --</p> <p>4 MS. ROBINSON: Let the record reflect that</p> <p>5 Exhibit 13 is Directive B.6.</p> <p>6 (EXHIBIT NUMBER 13 WAS MARKED FOR IDENTIFICATION.)</p> <p>7 BY MS. ROBINSON:</p> <p>8 Q. Let's move on to Exhibit B.9.</p> <p>9 not -- I mean Policy B.9.</p> <p>10 A. I have.</p> <p>11 Q. Will you please let me know when you're</p> <p>12 ready to discuss this policy?</p> <p>13 A. I'm ready.</p> <p>14 Q. Okay. Can you identify -- will you</p> <p>15 identify this policy, Sheriff White?</p> <p>16 A. "Use of Force," Directive B.9, Vance County</p> <p>17 Sheriff's Office Policy Manual.</p> <p>18 Q. And is that your signature?</p> <p>19 A. Yes.</p> <p>20 Q. Did you draft this policy?</p> <p>21 A. No.</p> <p>22 Q. Did you cause this policy to be drafted?</p> <p>23 A. Yes.</p> <p>24 Q. Can you go to the first page and read the</p> <p>25 date of that policy?</p>	<p>1 at the second sentence of Article 1?</p> <p>2 A. "By vesting deputies the lawful authori</p> <p>3 to use force to protect the public welfare, the</p> <p>4 reflection that balancing of all human interests is</p> <p>5 required."</p> <p>6 Q. Can you continue? Just read that whole</p> <p>7 statement, sir.</p> <p>8 I mean A. "Therefore, it is the policy of the Van</p> <p>9 County Sheriff's office that deputies shall use o</p> <p>10 that force which is reasonably necessary to</p> <p>11 effectively bring an incident under control while</p> <p>12 protecting the lives of the officer or another.</p> <p>13 Deputies shall use physical force in arrest and</p> <p>14 custody situations only in strict conformance wit</p> <p>15 the United States Constitution, laws of the State</p> <p>16 of North Carolina and this policy."</p> <p>17 Q. Have your officers -- have your deputie</p> <p>18 used force before?</p> <p>19 A. Yes.</p> <p>20 Q. Is that force prohibited?</p> <p>21 A. No.</p> <p>22 Q. Has a suspect been injured while using</p> <p>23 force before?</p> <p>24 A. Yes.</p> <p>25 Q. Can you identify some types of force th</p>

<p style="text-align: right;">Page 82</p> <p>1 is used?</p> <p>2 A. There's soft hands. Mace is used. She said.</p> <p>3 have been firearms used.</p> <p>4 Q. You said batons?</p> <p>5 A. Firearms.</p> <p>6 Q. Firearms.</p> <p>7 Do your deputies have batons?</p> <p>8 A. Yeah, some of them do.</p> <p>9 Q. How do you decide who gets batons?</p> <p>10 A. It depends on how many we have available. Some</p> <p>11 be issued. And sometimes we look at seniority, and</p> <p>12 other times we -- we may look to see who has</p> <p>13 an interest in one provided that they are certified</p> <p>14 to use it.</p> <p>15 Q. Can you provide a deputy with an instrument</p> <p>16 that he or she isn't certified to use?</p> <p>17 A. Normally we don't do that on the ones that</p> <p>18 require certification.</p> <p>19 Q. What instruments must the deputy be</p> <p>20 certified to use?</p> <p>21 A. The ASP baton, your mace or OC spray, use.</p> <p>22 firearms. That's all I can think of right now. And</p> <p>23 also, some are issued riot batons.</p> <p>24 Q. Are all officers or deputies issued</p> <p>25 firearms?</p>	<p style="text-align: right;">Page 84</p> <p>1 He retired. And then that went to Lieutenant Ray</p> <p>2 used. She said.</p> <p>3 Q. Can you spell his last, sir?</p> <p>4 A. S-E- -- S-H-E-A-R-I-N.</p> <p>5 Q. Can you read the Chemical Agents section</p> <p>6 Sheriff White?</p> <p>7 A. "Only sheriff's office-issued chemical</p> <p>8 agents may be carried and used by deputies of the</p> <p>9 Vance County Sheriff's Office. Prior to the issu</p> <p>10 cation of capsicum spray, OC spray, all deputies</p> <p>11 shall receive training in its use, which will inc</p> <p>12 2- who has instruction and actual allocation -- application</p> <p>13 3 certified the deputy an understanding of the effects</p> <p>14 Any use of OC spray other than in a training</p> <p>15 an instrument or spraying of animals or self-protection</p> <p>16 shall be reported as required by policy."</p> <p>17 Q. Can you para- -- paraphrase that statem</p> <p>18 sir?</p> <p>19 A. Basically you should not be carrying th</p> <p>20 the chemical spray unless you have been trained i</p> <p>21 21 sprays use.</p> <p>22 now. And So is it fair to say that the issuance</p> <p>23 OC spray without training is against procedure?</p> <p>24 A. It should not have been issued without</p> <p>25 training verification.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Yes.</p> <p>2 Q. Are they trained on the use?</p> <p>3 train --</p> <p>4 A. Yeah. Yes, they are trained by a certified</p> <p>5 firearms instructor. They also are trained in the</p> <p>6 Law Enforcement Training.</p> <p>7 Q. And that's the BLET?</p> <p>8 A. Yes.</p> <p>9 Q. How does a deputy express interest in the</p> <p>10 types of equipment?</p> <p>11 A. Generally if there's equipment available,</p> <p>12 some deputies will maybe approach a supervisor and</p> <p>13 say, can I have one of these or can I get one?</p> <p>14 provided that they have -- have recently been</p> <p>15 certified in whatever that is.</p> <p>16 Q. Do you offer certification?</p> <p>17 A. Yes.</p> <p>18 Q. Would a deputy have to request</p> <p>19 certification or....</p> <p>20 A. No. No. Sometimes they're -- some</p> <p>21 deputies are a little more eager than others.</p> <p>22 Q. Were you -- who was responsible for handing</p> <p>23 out the equipment?</p> <p>24 A. There were two different individuals under</p> <p>25 my tenure. The first one was Lieutenant</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. What is the training verification?</p> <p>2 Do you A. Some type of documentation saying that</p> <p>3 have completed that training.</p> <p>4 Q. And would that training verification co</p> <p>5 from Vance County Sheriff's Office?</p> <p>6 A. It would come from the instructor that</p> <p>7 performed the training.</p> <p>8 Q. Would that instructor be hired by Vance</p> <p>9 County or contracted by Vance County Sheriff's</p> <p>10 Office?</p> <p>11 A. Well, not necessarily because it could</p> <p>12 be done through a community college.</p> <p>13 Q. But it would have been at -- would the</p> <p>14 training been at the request of the Sheriff's</p> <p>15 Office?</p> <p>16 A. Yes.</p> <p>17 Q. Can you turn to page 3 of that document</p> <p>18 Sheriff White?</p> <p>19 A. Okay.</p> <p>20 Q. Can you read the section where it says</p> <p>21 "Serious Bodily Injury"?</p> <p>22 COURT REPORTER: And I'm sorry that --</p> <p>23 THE WITNESS: "Serious bodily injury th</p> <p>24 creates a substantial risk of death or is li</p> <p>25 to cause permanent disfigurement, coma,</p>

Page 86	Page 88
<p>1 protracted, or permanent condition. 2 inquiry -- it is an injury that causes 3 pain, prolonged or permanent loss of 4 of the function of any bodily member 5 that results in prolonged hospitalization 6 BY MS. ROBINSON: 7 Q. What does prolonged hospitalization mean? 8 A. A long time in the hospital. 9 Q. So would a week be prolonged? 10 A. It could be. 11 Q. Would a day be prolonged? 12 A. It could be depending on the individual 13 that's hospitalized, how they feel about it. 14 Q. So it's -- it's up to how the individual 15 feels about it? 16 A. No, it's not up to how they feel, but 17 prolonged to one person may not be prolonged 18 another. But basically what this policy 19 way I interpret it is saying, I mean, I 20 -- substantial time in a hospital. 21 Q. Well, this is -- this is a policy that you 22 signed off on, correct? 23 A. Yes. 24 Q. Okay. Let's -- let's move on 25 let's turn to page 4.</p>	<p>1 It is an Q. Let's move on to page 5, Medical 2 Assistance. 3 Okay. 4 or organ Q. Can you read where it says, "Medical 5 assistance shall be afforded...."? 6 No. "Medical assistance afforded shall 7 be afforded." 8 A. The first sentence? 9 Q. Yes. Yes, sir. 10 A. "Deputies shall make the scene as safe 11 possible and shall afford medical assistance to 12 individual injured persons considering:" 13 it. Q. And then read the next sentence. 14 A. "Amount and type of force...." -- the n 15 sentence? 16 "Medical assistance afforded shall be t 17 d same as for any other individual with similar 18 injuries including:" 19 Guess a Q. And can you read the two? 20 A. Including "First aid administered by th 21 within the limits of the affected deputy's 22 level of training, calling or offering to call 23 emergency medical services as appropriate." 24 Can -- Q. So is it your expectation that your 25 deputies if and when they injure someone, that th</p>
Page 87	Page 89
<p>1 A. (Complies.) 2 Q. Can you read the first sentence of the 3 General Guidelines? 4 A. "When lethal force is not authorized, 5 deputy should assess the situation in order to 6 determine which less lethal technique or 7 best de-escalate the incident to bring it 8 control in a safe manner." 9 Q. What is lethal force, Sheriff White? 10 A. Life-threatening. 11 Q. And what do you paraphrase this clause to 12 mean? 13 A. A use of force that could be 14 life-threatening or possibly take someone's 15 Q. The entire clause, sir. I'm sorry, say 16 would you paraphrase the entire clause? 17 A. The entire first sentence? 18 Q. Yes. 19 A. The deputy basically should assess the 20 situation and determine, as it says, which 21 which less than lethal technique or weapon 22 be -- will best deescalate the incident 23 under control in a safe manner. 24 Q. Is this a subjective inquiry? 25 A. Well, yeah, it could be.</p>	<p>1 seek treatment for that person also? 2 A. Yes, if they're in a position to do so. 3 Q. Can you explain that? You said if they 4 in position to do so. 5 A. They're able to do so. 6 weapon will When would they not be able to do so? 7 under A. If they're injured themselves to the po 8 where they're incapable. 9 Let's turn to page 15 of this document. 10 MS. ROBINSON: And also, let's -- let's 11 note that this is Exhibit 14. 12 (EXHIBIT NUMBER 14 WAS MARKED FOR IDENTIFICATION) 13 BY MS. ROBINSON: 14 Q. Can you -- do you see the section where 15 "Use of Force," Sheriff White? 16 A. "Other Use of Force"? 17 Q. Yes. Yes. 18 A. Yes. 19 Q. Can you read that first sentence? 20 A. "A deputy shall complete the Use of 21 Force/Assault Report on each occasion that he or 22 brings a person with any part of his body using 23 fist, elbow, knee, or neck restraint or uses or 24 displays any defensive weapon, OC spray included, 25 order to control a subject. On those occasions w</p>

Page 90	Page 92	
1 the deputy displayed only any defensive weapon, 2 excluding the electronic control device, ECD, a 3 brief, factual to-the-point narrative shall be 4 completed. The Use of Force/Assault Report shall 5 also be completed whenever a subject or a deputy Force/Assault Report -- this report and the 6 injured, complains of injury, or has visible injury of force policy reviewed with the deputies 7 or in any case where the subject is charged with involved. The supervisor performing the review 8 assaulting the deputy."	1 the Use of Force/Assault Report and send it, along 2 with a copy of the accompanying videos, if 3 applicable, directly to the Use of Force Board 4 lieutenant. The Use of Force/Assault Report 5 is required to be submitted to the sheriff's 6 office captain but can be provided upon request."	the deputy make an initial determination about whether deputy followed the Sheriff's Office Policy established training procedures. The Use of Force/Assault Report -- this report and the of force policy reviewed with the deputies The supervisor performing the review and the affected deputy, shall initial the U
9 Q. Okay. What is a Use of Force Report?	8 Force/Assault Report below the above-mention	
10 A. It's a form used by the sheriff's office statement. A supervisor who is involved in 11 document what took place during a use of force, such incident shall not conduct the review." 12 as I believe a date and time and what force was used. 13 and why, that type of thing.	10 A. The supervisor should review the policy 11 completeness prior to submission for filing. 12 Q. So does this mean that the supervisor m 13 the first determination as to whether or not the 14 force used was reasonable?	Force/Assault Report below the above-mention statement. A supervisor who is involved in incident shall not conduct the review." force was used. ROBINSON:
14 Q. Did you maintain a repository of this policy to mean?	13 Q. Does this -- what do you interpret this	
15 documents?	15 A. The supervisor should review the policy	
16 A. Yes.	16 completeness prior to submission for filing.	
17 Q. Is a Use of Force Report the same as an Q.	17 Q. So does this mean that the supervisor m	
18 assault report?	18 the first determination as to whether or not the	
19 A. No.	19 force used was reasonable?	
20 Q. What's the difference?	20 A. No. The supervisor is -- is reviewing	
21 A. I -- I'm not familiar with an assaultor completing -- completeness and also to make s	21 assaultor completing -- completeness and also to make s	
22 report.	22 that the policy was followed.	
23 Q. The policy names an assault report. Q. Can you read the second bullet, Sheriff	23 Q. Can you read the second bullet, Sheriff	
24 A. It says use of force, slash, assault White?	24 assault White?	
25 report. So reading this policy, that would be one A.	25 A. "The deputy's supervisor shall then sig	
Page 91	Page 93	
1 and the same.	1 the Use of Force/Assault Report and send it, along	
2 Q. They're the same. Okay. Thank you.	2 with a copy of the accompanying videos, if	
3 So if a deputy is injured, it is the applicable, directly to the Use of Force Board	3 applicable, directly to the Use of Force Board	
4 expectation that the deputy document that on forms? lieutenant. The Use of Force/Assault Rep	4 lieutenant. The Use of Force/Assault Rep	
5 If a -- if a deputy is injured by a suspect, it is required to be submitted to the sheriff's	5 is required to be submitted to the sheriff's	
6 the expectation that the deputy document that office captain but can be provided upon request."	6 office captain but can be provided upon request."	
7 injury?	7 Q. Who -- who sits on the Use of Force	
8 A. Yes. If -- if the form is complete Board?	8 Board?	
9 there is an injury to the deputy, yes, it should be I don't know who -- who is on it now,	9 it should be I don't know who -- who is on it now,	
10 documented on that report.	10 obviously. But when I was there, there was -- I	
11 Q. Okay. Can -- let's turn to page 16 don't remember the number of people. I think it	11 don't remember the number of people. I think it	
12 A. Page 16 or 17?	12 four or five. I remember Lieutenant Stainback be	
13 Q. 16, sir.	13 one of them. I think Captain Lloyd Watkins was c	
14 A. Okay.	14 and I don't recall the -- the others. But genera	
15 Q. This -- this -- this policy says, "Review	15 Review -- there was also -- I believe there wa	
16 by Supervisor"?	16 one sergeant that sat on it, if I remember correc	
17 A. Yes.	17 I don't recall who that was.	
18 Q. Can you read that first bullet?	18 Q. How regularly did the Use of Force Boar	
19 COURT REPORTER: And could you please convene?	19 convene?	
20 slower, please?	20 A. I'm not sure. That depended on the num	
21 THE WITNESS: "The deputy's supervisor Use of Force forms we received.	21 Use of Force forms we received.	
22 shall review the use of force, slash, assault Q.	22 assault Q.	
23 report for completeness with the deputy deputy's supervisor" --	23 deputy's supervisor" --	
24 submission. In addition, the supervisor shall Yes.	24 Yes.	
25 review any accompanying video and this direct Q.	25 this direct Q.	

Page 94	Page 96
<p>1 supervisor?</p> <p>2 A. Yes. That would be the sergeant.</p> <p>3 Q. And -- and would that sergeant</p> <p>4 the Use of Force Board?</p> <p>5 A. It wouldn't be that -- it wouldn't be the</p> <p>6 sergeant that was in -- if the sergeant</p> <p>7 in the incident, they wouldn't do the --</p> <p>8 wouldn't be the one who reviewed the use</p> <p>9 It could very well be that the sergeant</p> <p>10 at the time will review a Use of Force</p> <p>11 by someone on his shift on that board.</p> <p>12 Q. Let's go to the third bullet.</p> <p>13 A. (Complies.)</p> <p>14 Q. Can you read that third bullet,</p> <p>15 A. "Training or policy issues identified</p> <p>16 during a supervisory review shall not be</p> <p>17 the Use of Force/Assault Report, but in</p> <p>18 documented on the appropriate form, per</p> <p>19 record, official complaint, etcetera and</p> <p>20 accordance with procedures established</p> <p>21 sheriff's office. A copy of the form s</p> <p>22 attached to the Use of Force/Assault R</p> <p>23 shall be forwarded to the Use of Force</p> <p>24 Q. What -- what was the process</p> <p>25 the sheriff's office?</p>	<p>1 words, it -- it was not all command staff on the</p> <p>2 board.</p> <p>3 also sit on Will you turn to the section that says,</p> <p>4 "Review by Board"?</p> <p>5 Yes.</p> <p>6 Q. Sheriff White, I didn't ask you this.</p> <p>7 you have any women under your leadership, sir?</p> <p>8 A. Any?</p> <p>9 Q. Women?</p> <p>10 Any what?</p> <p>11 Q. Any women who served under your</p> <p>12 leadership?</p> <p>13 A. Oh. Yes. I -- as a matter of fact, I</p> <p>14 hired the first female deputy in the Vance County</p> <p>15 Sheriff's Office.</p> <p>16 Q. How many women did you employ as</p> <p>17 deputies?</p> <p>18 A. Well, it varied at different times. I</p> <p>19 think the highest I've ever had at one time was t</p> <p>20 four. I can't remember the exact number. One</p> <p>21 two, three, four.</p> <p>22 Q. But a woman didn't sit on the -- on the</p> <p>23 "Review of Force" Board?</p> <p>24 No, not that I recall.</p> <p>25 Q. Okay. So we were about to discuss the</p>
Page 95	Page 97
<p>1 A. The officer fills out a Use of Force</p> <p>2 -- submits it to be reviewed by the immediate</p> <p>3 supervisor. It would go to the liaison</p> <p>4 And when the Use of Force Board convened,</p> <p>5 review the forms that they had before them.</p> <p>6 Q. Okay. Can you specifically explain what it</p> <p>7 means -- what you were inten- -- what you intended</p> <p>8 when it says, "...and processed in accordance with</p> <p>9 procedures established by the sheriff's office?"</p> <p>10 How does a -- how does a Use of Force</p> <p>11 training or policy, how was it -- how was that</p> <p>12 processed, a policy issue? How was it processed?</p> <p>13 A. If there was a-- an issue that appeared</p> <p>14 be a training or policy issue, then that would be</p> <p>15 addressed as in maybe some kind of refresh</p> <p>16 or something or a reminder if it appeared to</p> <p>17 kind of policy violation.</p> <p>18 Q. Who appointed the board members?</p> <p>19 A. I did.</p> <p>20 Q. How did you select the board members?</p> <p>21 A. Well, I tried to get somebody from patrol,</p> <p>22 administrative, such as a patrol lieutenant.</p> <p>23 I remember correctly, from time to time there was a</p> <p>24 sergeant on the board. So I tried to have a</p> <p>25 representation of the sheriff's office.</p>	<p>1 "Review by the Board." Can you read the last two</p> <p>2 bullets?</p> <p>3 A. Under "Review by the Board"?</p> <p>4 Q. Yeah.</p> <p>5 A. "All Use of Force/Assault Reports and t</p> <p>6 training video will be reviewed and analyzed</p> <p>7 bi-monthly by the Use of Force Board. The</p> <p>8 may request, through the chain of command,</p> <p>9 additional information and clarification on any U</p> <p>10 Force/Assault Report. The sheriff's office</p> <p>11 captain shall appoint board members for three yea</p> <p>12 the following sections, with one deputy hold</p> <p>13 of lieutenant who shares -- who shall se</p> <p>14 as chairperson: Patrol division, one member serge</p> <p>15 Internal affairs, one member; Training liaison,</p> <p>16 responsible for coordination of training;</p> <p>17 Investigations division, one sergeant or detectiv</p> <p>18 Deputies, two enforcement members, road deputies;</p> <p>19 Operations division."</p> <p>20 Q. Who -- who was the captain? Who....</p> <p>21 A. Generally it was Captain Bullock once h</p> <p>22 was promoted to captain, which was in my -- early</p> <p>23 as sheriff, first term.</p> <p>24 COURT REPORTER: And who -- what was th</p> <p>25 In other captain's name, please?</p>

Page 98	Page 100
<p>1 THE WITNESS: Weldon Bullock. 2 COURT REPORTER: Okay. Thank 3 BY MS. ROBINSON: 4 Q. Do you recall how many Use of Force 5 incident -- incident reports or summary reports you 6 reviewed, Sheriff White? 7 A. No, I do not. 8 Q. Were there very few? 9 A. I would say yes. We didn't get very 10 many. 11 Q. Would you say like less than 20, less than 12 50? 13 A. I don't know how -- I don't recall 14 Q. Is the Use of Force a closed-type review 15 process? 16 A. Help me understand what you mean by closed. 17 Q. Is it limited to the incident at hand or 18 did the board consider other aspects of the deputy's 19 A. No. That would be limited to the reports 20 that they had in hand. 21 Q. Can you read the last bullet, Sheriff 22 White? 23 A. "All use of force from the" 24 on page 16? 25 Q. Yes, sir. 17.</p>	<p>1 BY MS. ROBINSON: 2 Q. Can you -- Sheriff White, can you review 3 Directive D.7? 4 A. B.7? 5 MR. GEIS: Is it in there? 6 THE WITNESS: Say B.7 or -- okay. B.7. 7 Okay. 8 BY MS. ROBINSON: 9 Q. So you've had time to review the policy 10 Sheriff White? 11 Yes. 12 Q. Can you identify this policy, Sheriff 13 White? 14 A. Directive D.7 from the Vance County 15 Sheriff's Office Policy Manual. 16 Q. Did you sign this policy? 17 A. Yes. 18 Q. Did you -- policy? 19 COURT REPORTER: What was the question? 20 BY MS. ROBINSON: 21 Sheriff Q. Did you implement this policy? 22 A. No. I thought you asked me did I sign 23 are policy 24 No, I did not implement the policy. 25 Q. Who implemented the policy?</p>
Page 99	Page 101
<p>1 A. Okay. The last one. 2 "If a deputy is involved in three or more 3 Use of Force/Assault incidents in a quarter, or six 4 or more within a consecutive 12-month period, the 5 chairman of the Use of Force Review Board or his 6 designee will obtain this information, assign 7 the review board member from internal affairs who 8 will review the reports and the deputy's 9 file to determine if a pattern of improper behavior 10 is apparent." 11 Q. Who -- who -- who are you referring to when 12 you say "internal affairs"? 13 A. Well, I didn't have -- 14 Q. What are you -- 15 A. I did not have an internal affairs section. 16 So again, that would have gone to Captain 17 Bullock. 18 Q. What do you interpret this last bullet to 19 mean? How would you interpret that? 20 A. That the -- the use of force 21 monitored. 22 MS. ROBINSON: Okay. Can we 23 for about five minutes? 24 MR. GEIS: Yes. 25 (BREAK TAKEN)</p>	<p>1 A. It was a company we hired. You mean -- 2 I understood you. I'm thinking that you asked 3 if I drafted this policy. Yes, I implemented this 4 policy. 5 Q. Okay. Let's go to the first page of the 6 policy. 7 (Complies.) 8 Q. Can you read the effective date? 9 July 15th, 2009. 10 Q. Has this policy been updated? 11 The manual itself -- a portion or a 12 specific section of the manual itself has been 13 updated, but I can't say that this particular 14 directive has been updated. 15 Q. Read the first sentence of this policy 16 Weldon 17 MS. ROBINSON: Well, let's first identify 18 this as Exhibit 15. 19 (EXHIBIT NUMBER 15 WAS MARKED FOR IDENTIFICATION) 20 BY MS. ROBINSON: 21 Q. Will you read the name of this policy? 22 A. "Grievance Procedure and Adverse Action" 23 Q. Will you also read the first paragraph, 24 first two paragraphs? 25 A. "It is the policy of the county to provide</p>

Page 102	Page 104
<p>1 a just and prompt procedure for presentation, 2 consideration and disposition of employee grievances. 3 The purpose of this article is to outline 4 procedure and to assure all employees that a response 5 to their complaints and grievances will be prompt and 6 fair. Employees utilizing the grievance procedure 7 shall not be subjected to retaliation or 8 harassment from supervisors or employees 9 exercising their rights under the grievance 10 procedure. Supervisors or other employees who 11 violate this policy shall be subject to disciplinary 12 action up to and including dismissal."</p> <p>13 Q. Thank you. 14 What do you consider a complaint? 15 A. Well, a complaint can be any number of 16 things. 17 Q. Must it be written? 18 A. No. All complaints don't need to be 19 written. 20 Q. So a complaint can be oral? 21 A. Yes. 22 Q. Is a complaint the same thing as a 23 grievance? 24 A. Not necessarily. 25 Q. Explain the difference.</p>	<p>1 Q. How did you resolve grievances? 2 A. I've only had one that I recall that was 3 forwarded to HR and then forwarded to me. Once I 4 received it, an investigation was done, and a 5 response was given back to the individual initiating 6 the grievance, and a copy was given to HR. 7 Q. How did you resolve complaints? 8 A. The investigation revealed that the 9 alleged -- the allegations in the grievance did not 10 occur as described in the grievance, were not 11 substantiated. 12 Q. We're going to get to that. 13 My question more specifically was how did you 14 resolve complaints? 15 A. Oh, I thought you said grievances. 16 It would depend on the type of complaint. 17 Some -- some complaints warranted an investigation 18 to some didn't. 19 Q. Would you conduct the investigation? 20 A. It depended on the type of complaint. 21 Q. What type of complaints did you 22 investigate? 23 A. Again, all complaints did not warrant a 24 investigation. Again, if somebody called and I 25 answered the phone, they say, I'm wondering why y</p>
Page 103	Page 105
<p>1 A. A complaint may just be something as 2 similar -- as simple as I'm working too 3 or I'm working too many days or I didn't 4 get my birthday; and, you know, a complaint 5 basically anything. 6 Q. And what's a grievance? 7 A. To me, a grievance would be geared 8 toward some type of mistreatment or harassment 9 type of thing. 10 Q. Can a grievance be oral? 11 A. It could be oral, but at some point the 12 individual may be asked to put it in writing. 13 Just described. 14 Q. Was it your practice to require written 15 grievances? 16 A. Not beginning -- it depends on what stage 17 the grievance was in. If there was a grievance 18 it came to me, it was in writing. 19 Q. Did you employ the same method of 20 investigation, whether a grievance be written or 21 oral? 22 A. Basically, yes. But, again, if it was 23 a grievance that required an investigation, the 24 initiating the grievance would mostly be 25 it in writing at some point.</p>	<p>1 thing as deputy is speeding down I-85. You know, I would 2 many nights -- little bit about how fast do you think he 3 get was going, does he have his emergency equipment on 4 that type of thing. That did not warrant an 5 investigation in my opinion. 6 Q. I'm -- I'm specifically asking about how 7 did you -- how -- how did you go about investigating 8 workplace complaints; so not citizen complaints, 9 workplace complaints. 10 A. I don't recall having but one workplace 11 complaint, and that was handled in the manner that 12 was described. 13 Q. So do you consider a complaint about a 14 performance evaluation a workplace complaint? 15 A. Yes. 16 Q. So how -- how would you go about handling 17 workplace complaints? 18 A. If it's -- as it relates to an evaluation 19 for a performance appraisal, I would talk with the 20 supervisor that completed the appraisal as well as 21 the individual that it was done on, try to see if 22 they can reach a happy medium, so to speak, if it 23 because they didn't agree on something that was on 24 the evaluation form. 25 Q. Did you ever involve human resources?</p>

Page 106	Page 108
<p>1 A. No, not in the -- no. Human 2 only involvement human resources had on 3 evaluation or appraisal was the copies were forwarded 4 to the HR director.</p> <p>5 Q. Did all complaints and grievances have to 6 go directly to you?</p> <p>7 A. It depends on -- if it's concerning the 8 sheriff's office, they should come to me</p> <p>9 Q. I would -- I would like for you to 10 Directive E.2. 11 (EXHIBIT NUMBER 16 WAS MARKED FOR IDENTIFICATION.) 12 THE WITNESS: I have it. 13 BY MS. ROBINSON:</p> <p>14 Q. Do you need a moment to review 15 A. Yes. 16 Okay.</p> <p>17 Q. Sheriff White, have you had an opportunity 18 to review the document?</p> <p>19 A. Yes.</p> <p>20 Q. Can you please identify the document? 21 A. Directive E.2: "Investigation 22 Complaints and Charges Against Personnel" 23 Q. And what -- is this a Vance County 24 Sheriff's Office policy? 25 A. Yes.</p>	<p>rd- -- shall be processed as provided in this policy." 2 -- on a Q. What does that mean? 3 That it should be accepted, documented 4 resolved if it could be.</p> <p>5 So a complaint doesn't have to go direct 6 to you?</p> <p>7 A. No.</p> <p>8 Q. And even those complaints that go to ot 9 to should be accepted and resolved?</p> <p>10 A. Yes, if possible before getting to me. 11 Let's talk about those complaints. How 12 should those complaints be processed?</p> <p>13 A. Again, it depends on what type of compl 14 it is. If it's a citizen's complaint, we have a 15 that we will ask the citizens to complete. If th 16 -- if they come in person and complain, we ask th 17 complete the form. If they complain over the 18 phone, we ask them some questions and document wh 19 they say or we may ask them to stop by and comple 20 the form.</p> <p>21 Q. How should the internal complaints be 22 processed?</p> <p>23 A. Internal complaints should go from the 24 member that's doing the complaining to his immedi 25 supervisor and go up the chain of command until i</p>
Page 107	Page 109
<p>1 Q. Is your signature at the bottom of the 2 policy?</p> <p>3 A. Yes, that's mine.</p> <p>4 Q. Did you implement this policy? 5 A. Yes.</p> <p>6 Q. Can you go to the first page of the 7 document and read the date at the top right-hand 8 corner?</p> <p>9 A. Effective 7/15/2009.</p> <p>10 Q. Did you update this policy? 11 A. I don't believe so.</p> <p>12 Q. Can you read the first sentence of this 13 policy?</p> <p>14 A. "This policy provides guidelines for 15 accepting, recording, resolving and forwarding 16 complaints."</p> <p>17 Q. How is a complaint accepted pursuant to 18 this policy?</p> <p>19 A. Sometimes they come in writing 20 they come over the phone. Sometimes the 21 person. And it is generally accepted by 22 receives the complaint.</p> <p>23 Q. Will you read the second sentence of 24 Accepting Complaints? 25 A. "Charges from within the sheriff's office</p>	<p>1 of the 2 Q. Do you require any documentation of the 3 complaint?</p> <p>4 A. Yes, it has to be documented.</p> <p>5 Q. Who documents the complaint? 6 A. It begins with the person receiving the 7 complaint.</p> <p>8 Q. So if the -- if it's a supervisor, the 9 supervisor should document the complaint?</p> <p>10 A. Yes. If it's a deputy complaining to a 11 supervisor, the supervisor should document it. A 12 that particular supervisor cannot resolve it, 13 should be forwarded up until it is resolved.</p> <p>14 Q. Can you read the last sentence of Accept 15 Complaints?</p> <p>16 A. "A supervisor has the obligation to 17 investigate possible violations of policy even if 18 person providing the information does not want a 19 complaint filed."</p> <p>20 Q. What does that mean? 21 A. To me, it means that if someone, for 22 example, calls or comes in and complain about 23 something that may be a policy violation, the 24 supervisor has an obligation to look into it.</p> <p>25 Q. So that would apply in the citizen's</p>

Page 110	Page 112
<p>1 context and in the workplace context, correct person -- in the personnel file?</p> <p>2 A. Yes.</p> <p>3 Q. Do you consider accusations or -- is.</p> <p>4 accusations isn't the best word. But do you consider Would the result be commuted --</p> <p>5 reports about the distribution of bulletproof vests a complaint? communicated to the employee?</p> <p>6 complaint?</p> <p>6 A. Yes.</p> <p>7 A. Can -- can you repeat that question? Q. We're going to turn back to this policy</p> <p>8 Q. Do you consider reports about the but I just want to move on to E.3.</p> <p>9 distribution of bulletproof vests a complaint? MR. GEIS: Is this Exhibit Number 17 or</p> <p>10 A. Now what do you mean by distribut -- MS. ROBINSON: 17.</p> <p>11 "distribution of bulletproof vests"? 11 (EXHIBIT NUMBER 17 WAS MARKED FOR IDENTIFICATION)</p> <p>12 Q. Providing deputies.... 12 MR. GEIS: Okay. In the interest of ti</p> <p>13 A. Okay. To -- in the sheriff's office itself are free to tell Sheriff White, but it's</p> <p>14 providing bulletproof vests to deputies 14 to you, that he doesn't have to read the who</p> <p>15 Q. Yes. 15 thing before you ask him questions.</p> <p>16 A. Well, yeah, that could be a complaint. MS. ROBINSON: I just want him to read</p> <p>17 Q. And you would expect that to be 17 to get acquainted with it.</p> <p>18 investigated? 18 MR. GEIS: Okay.</p> <p>19 A. It definitely needs to be looked into. THE WITNESS: Okay.</p> <p>20 Q. What about, would you consider a report of ROBINSON:</p> <p>21 the use of racial slurs a complaint? 21 Q. Have you had time to read and review th</p> <p>22 A. Yes. 22 policy, Sheriff White?</p> <p>23 Q. What about the use of slurs related to A. Yes.</p> <p>24 someone's sexual orientation? 24 Q. And for the record, can you please stat</p> <p>25 A. Yes. That would be considered 25 the -- the name of this policy?</p>	
Page 111	Page 113
<p>1 complaint.</p> <p>2 Q. What -- what happens when complaints aren't.</p> <p>3 recorded? 3 Q. And whose policy is this?</p> <p>4 A. It depends on the type of complaint. It's Vance County Sheriff's Office.</p> <p>5 may be something that is considered minor, and 5 Q. And did you sign this policy?</p> <p>6 whoever has received a complaint may just remember A. Yes.</p> <p>7 what it's about. But it still needs to be locked 7 Q. Did you implement this policy?</p> <p>8 into. 8 A. Yes.</p> <p>9 Q. The receiving person can store it in memory Can you read the effective date of this</p> <p>10 and -- 10 policy?</p> <p>11 A. Correct. And then forward it up that way. July 15th, 2009.</p> <p>12 if it's something that is considered minor or 12 Q. Did you update the policy?</p> <p>13 simple. 13 A. I don't believe this particular section</p> <p>14 Q. When you say forwarded -- 14 updated.</p> <p>15 A. Through the chain, if necessary, if it 15 Q. Can you read the first sentence of the</p> <p>16 cannot be resolved. 16 second paragraph?</p> <p>17 Q. But if the complaint can be resolved, then "It is the policy of the Vance County</p> <p>18 it doesn't need to be forwarded? 18 Sheriff's Office that no employee may engage in</p> <p>19 A. After -- if it can be resolved, on conduct that falls under the definition of unlawf</p> <p>20 resolved, then the results need to be forwarded harassment in the workplace. All employees are</p> <p>21 Q. Okay. Who would the results be forwarded 21 need the right to work in an environment fr</p> <p>22 to? 22 from unlawful harassment in the workplace and</p> <p>23 A. They would go through the chain of command. The sheriff's office prohibits its</p> <p>24 and possibly end up with me. 24 personnel from harassing clients, supervisors,</p> <p>25 Q. Would the results be recorded in a 25 colleagues, community representatives, subordinates</p>	

Page 114	Page 116
<p>1 or other persons or groups with whom they have</p> <p>2 contact as representatives of the organization. The</p> <p>3 sheriff's office will promptly and thoroughly</p> <p>4 investigate all complaints made by an employee and</p> <p>5 will take appropriate remedial or disciplinary</p> <p>6 up to and including dismissal."</p> <p>7 Q. Can you read the section where it says,</p> <p>8 "Definitions of Unlawful Workplace Harassment"</p> <p>9 A. "Unlawful workplace harassment is unlawful</p> <p>10 or unsolicited speech or conduct based on race, sex,</p> <p>11 creed, religion, national origin, age, disability,</p> <p>12 handicapping condition as defined in N.C. Stat. Sec. 143-33.3</p> <p>13 that creates a hostile work environment or</p> <p>14 circumstances involving quid pro quo. Additional</p> <p>15 jokes or comments based on an individual's sex, race, (Complies.)</p> <p>16 color, national origin, disability, religion, age or</p> <p>17 other status protected by State or Federal law shall</p> <p>18 not be tolerated."</p> <p>19 Q. What does that mean?</p> <p>20 A. There is a zero tolerance policy in the</p> <p>21 Vance County Sheriff's Office for this type of stuff.</p> <p>22 Q. So jokes about someone's sexual orientation</p> <p>23 isn't allowed?</p> <p>24 A. No.</p> <p>25 Q. Jokes about someone's race isn't allowed?</p>	<p>1 Q. Would you consider an apology a disciplinary action?</p> <p>2 A. No.</p> <p>3 Q. Do you consider these types of instances grievances or complaints?</p> <p>4 A. Yes, that could be either/or.</p> <p>5 Q. Why -- why did you implement a zero tolerance policy?</p> <p>6 A. Well, it wasn't implemented as a zero tolerance policy. That is just my characterization of this policy, but it was clearly implemented</p> <p>7 Q. Okay. Let's -- let's go to page 2 of the document.</p> <p>8 A. (Complies.)</p> <p>9 Q. Can you read or describe -- can you please describe to me what's a formal complaint?</p> <p>10 A. To me, a formal complaint is it could be any complaint that's documented.</p> <p>11 Q. Documented by whom?</p> <p>12 A. Whoever is receiving the complaint.</p> <p>13 Q. So if the receiving party just stored it in memory, then it wouldn't be a formal complaint?</p> <p>14 A. It would depend on the complaint itself</p> <p>15 if something simple that the receiving party</p>
Page 115	Page 117
<p>1 A. No.</p> <p>2 Q. Jokes about someone's gender isn't allowed?</p> <p>3 A. If it's in a negative or type of tone that</p> <p>4 could offend somebody, no.</p> <p>5 Q. What happened once -- if someone does a joke about someone's protected status?</p> <p>6 A. If it is brought to the attention of a</p> <p>7 supervisor, then that supervisor has a responsibility</p> <p>8 to look into what's happened, document it, try to</p> <p>9 resolve it.</p> <p>10 Q. So you mentioned a zero tolerance policy. What would you expect to be the outcome of an investigation in which someone said -- made a comment about someone's race, sexual orientation, gender?</p> <p>11 A. The outcome should be some type of mutual understanding between all parties involved.</p> <p>12 Q. What do you mean by "mutual understanding"?</p> <p>13 A. It could be an apology or I was not offended by that or no harm done, that type of thing.</p> <p>14 Q. Would there be any disciplinary action?</p> <p>15 A. It could be depending on the circumstances.</p>	<p>1 may have made a mental note of. An example: If there's a deputy internally saying that the squad room is too hot or too cold, the supervisor can make a mental note of that and either adjust the temperature one way or the other, and hopefully it resolved at that point.</p> <p>2 Q. Sheriff White, this policy is specifically addresses workplace harassment, correct?</p> <p>3 A. Yes.</p> <p>4 Q. So in the context of workplace harassment and retaliation, can you tell me what is a formal complaint?</p> <p>5 A. To me, that's any complaint that has -- alleged.</p> <p>6 Q. What is a -- an informal complaint in the context of workplace harassment or retaliation?</p> <p>7 A. An informal complaint could be something said in a joking manner depending on how it was initiated.</p> <p>8 Q. Do you require that informal complaints be investigated?</p> <p>9 A. They need to be looked -- looked into and resolved if possible.</p> <p>10 Q. Do they need to be looked into by you?</p>

Page 118	Page 120
<p>1 A. No, not necessarily. It can be resolved anywhere in the chain of command.</p> <p>2 Q. Would you consider an informal complaint something that you would look into and resolve?</p> <p>3 A. Yes, depending on if it's involving anything in this particular policy. Yes.</p> <p>4 Q. Have you looked into or resolved informal complaints?</p> <p>5 A. I am not aware of any informal complaints that has come to my attention concerning this.</p> <p>6 Q. Okay. Let's go down to direct observation.</p> <p>7 A. (Complies.)</p> <p>8 Q. Can you read that statement, Sheriff White?</p> <p>9 A. "Direct Observations: Supervisors at levels who directly observe potentially harassing conduct must consider these observations equivalent to any other form of complaint. The investigation process is indicated where a supervisor or department head feels observed conduct may indeed be prohibited behaviors."</p> <p>10 Q. What is potentially harassing conduct?</p> <p>11 A. Can you say that again?</p> <p>12 Q. What is potentially harassing conduct?</p> <p>13 A. It's conduct that could be construed as</p>	<p>1 A. No, it should be documented.</p> <p>2 Q. Should instances in which an employee complains that another employee is being harassed, should those instances be documented also?</p> <p>3 A. Yes.</p> <p>4 Q. How many supervisors did you employ at the time of Mr. White's tenure?</p> <p>5 A. At the time of his what?</p> <p>6 Q. Tenure.</p> <p>7 A. What was the question?</p> <p>8 Q. How many supervisors did you employ at the time of Mr. White's tenure?</p> <p>9 A. I don't recall that exact number.</p> <p>10 Q. Sheriff White? How many deputies did you employ at the time of Mr. White's tenure?</p> <p>11 A. I don't recall that number either because I don't have that information based on how many vacancies we had, how many we could fill them, that type of thing.</p> <p>12 Q. But a sergeant up is a supervisor, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Can you look at the "Disciplinary Action" section?</p> <p>15 A. Ready.</p> <p>16 Q. Can you read that?</p>
Page 119	Page 121
<p>1 harassing.</p> <p>2 Q. Can you give me an example?</p> <p>3 A. No, I cannot.</p> <p>4 Q. I'm sorry, sir. I didn't hear you.</p> <p>5 A. No, I cannot.</p> <p>6 Q. You can't because -- are you saying that you cannot because you can't think of any examples or you haven't experienced any examples or you just don't want to give an example?</p> <p>7 A. I just can't think of any examples, and I don't want to speculate on anything.</p> <p>8 Q. What do you -- what does it mean by supervisors who directly observe? What is a direct observation?</p> <p>9 A. Supervisors that either sees something.</p> <p>10 Q. So direct observation is seeing or hearing?</p> <p>11 A. Yes. If you are in proximity or firsthand.</p> <p>12 Q. Does the supervisor have any discretion to not conduct an investigation?</p> <p>13 A. No, not in this type of stuff.</p> <p>14 Q. Does the supervisor have any type of discretion to not document the situation?</p>	<p>1 A. "Disciplinary action taken against the harasser would typically range from a written warning, counseling, suspension from work, transfer to a different position or termination of employment."</p> <p>2 Q. What is a written warning?</p> <p>3 A. Basically putting in writing warning to individual to change their behavior.</p> <p>4 Q. Is that a standard form?</p> <p>5 A. Yes.</p> <p>6 Q. What is counseling?</p> <p>7 A. COURT REPORTER: I'm sorry. Say that again, please.</p> <p>8 BY MS. ROBINSON:</p> <p>9 Q. Counseling. What is counseling?</p> <p>10 A. Counseling is sitting down with the individual, explaining to them what they have done wrong allegedly or how they could have done things differently and trying to get them to see how not to commit the same offense again.</p> <p>11 Q. Is counseling less severe or more severe than a warning?</p> <p>12 A. Well, they're both, I would say, equal.</p> <p>13 Q. Counseling is a little more detailed.</p> <p>14 Q. Is there a form that goes into an</p>

Page 122	Page 124
<p>1 employee's record -- 2 A. Yes. 3 Q. -- if they receive counseling? 4 A. Yes. If they receive any of the things 5 listed here. 6 Q. How detailed is a counseling form? 7 A. I would say it's not a very, very detailed 8 form. It's just enough to get the point across and, 9 if necessary, change the behavior of whoever the 10 offender is. 11 Q. How long does counseling typically last? 12 take? 13 A. It depends on the situation. 14 Q. Ten minutes, an hour? 15 A. It depends on the situation. 16 vary. 17 Q. What's the shortest counseling? 18 A. There's really no time limit on a 19 counseling. 20 Q. Uh-huh. Who would perform the 21 counseling? 22 A. It depends on the situation. 23 anywhere from the immediate supervisor 24 chain of command. 25 Q. Have you ever performed counseling?</p>	<p>1 Q. Does the person, do they have to leave 2 their badge or -- so what's the process when a person 3 is suspended? 4 A. Yes. If someone is suspended, normally 5 -- we keep their badge, their ID, the vehicle. 6 Basically we keep almost all of the equipment issued 7 other than the uniforms. 8 Q. Do you consider a K-9 equipment? 9 A. No, not really. I consider a K-9 more 10 partner to the handler. 11 Q. So the K-9 could stay with the -- the 12 handler? 13 A. Yes, depending on the period or we could 14 get another K-9 handler to deal with that particular 15 case. 16 Q. Do you have a distinction between a 17 long-term and a short-term suspension? 18 A. No. There's really no distinction other 19 than one is longer or shorter than the other one. 20 Q. So what's a short-term suspension? 21 A. The -- again, there's -- there's no 22 specific term. 23 Q. What's the purpose of suspension? 24 A. Disciplinary. 25 Q. Okay. And so then you have transfer to</p>
Page 123	Page 125
<p>1 A. I -- as sheriff? I -- I believe 2 not -- I don't recall any incident specifically 3 I believe I have. 4 Q. Does -- does an employee have to sign a 5 form indicating that they've have been counseled? 6 A. Yes. They are asked to sign it, 7 don't have to. 8 Q. If an employee doesn't sign the counseling 9 form, is that in any way considered a rejection of 10 the counseling? 11 A. Well, it could be construed that way 12 not necessarily. 13 Q. So what happens if an employee doesn't sign 14 a counseling form? 15 A. Whoever it is that's doing the 16 counseling will continue to try to explain exactly 17 what is going on, trying to make sure that the 18 individual that's being counseled understands 19 it's all about. But in the end, they don't have to 20 sign it if they choose not to. 21 Q. Okay. And then the next disciplinary 22 action is suspension from work. What does that 23 entail? 24 A. Suspension from work, it could be 25 it's without pay when you're suspended</p>	<p>1 different position. What does that mean, to be 2 transferred to a different position? 3 A. It means the changing of duties and 4 responsibilities. 5 Q. Have you ever implemented this course of 6 action? 7 A. I don't recall one as it pertains to 8 disciplinary action. I may have. I just don't 9 recall it at this moment. 10 Q. Would this be -- is this similar to a 11 demotion? 12 A. It could be or it could be included with 13 a demotion. 14 Q. So are you -- you -- you can't recall a 15 instance in which you demoted someone? 16 A. Well, yes, I can recall an incident in 17 which I demoted someone. 18 Q. Can you tell me about that instance? 19 I had an individual that was reduced in 20 rank and was given a reduction in pay. 21 Q. What was the -- the demotion for? 22 A. Conduct. 23 Q. I'm sorry, sir. I didn't hear you. 24 Conduct. 25 Q. Conduct.</p>

Page 126		Page 128	
1	A. Yes.	1	MS. ROBINSON: I -- ba- -- based on my
2	Q. So improper conduct.	2	estimation, we can go well beyond 7:00.
3	What was the race of that individual?	3	MR. GEIS: Well, then calculate, please.
4	A. He was a white male.	4	MS. ROBINSON: Right. And as long as we
5	Q. Can you recall what he did?	5	understand that this isn't deposition time.
6	A. Yes.	6	MR. GEIS: Well, we're on the record. This
7	Q. What did he do to deserve the demotion?	7	deposition time.
8	A. Allegedly he made a comment to a female	8	MS. ROBINSON: Well, let's take a break.
9	that was inappropriate.	9	MR. GEIS: No, we're not -- we're not going
10	Q. Are you referring to Campbell?	10	to take a break. We're here and we're ready to
11	A. I'm just saying that it was a deputy	11	go that I
12	had an opportunity to use disciplinary action on.	12	MS. ROBINSON: Well, I -- and then come
13	Q. What was the comment to the female?	13	back -- and then let's come back with the time
14	A. I don't recall the exact comments.	14	that's left.
15	Q. Were you involved in the investigation?	15	MR. GEIS: Well, we're -- we're -- we're
16	A. No.	16	here. We're ready to go. Please ask your
17	Q. Was it a civilian or a -- an employee?	17	questions.
18	A. A civilian.	18	MS. ROBINSON: Well, we would like a
19	Q. Did the civilian complain?	19	bathroom break.
20	A. A member of that individual's family	20	MR. GEIS: Well, five minutes? Are we
21	complained.	21	going to take a five-minute break?
22	Q. Of the civilian's family?	22	MS. ROBINSON: Let's take a ten-minute
23	A. Yes.	23	break.
24	Q. What is the -- what was the race of the	24	MR. GEIS: All right. We'll take -- we'll
25	civilian?	25	take a ten-minute break.
Page 127		Page 129	
1	A. The one that complained?	1	(BREAK TAKEN)
2	Q. Yes.	2	COURT REPORTER: Five hours and 34 minu
3	A. It was a white male.	3	is what I have.
4	Q. Was the demotion effective?	4	MR. GEIS: That's about what I have. I
5	A. Yes, I believe so.	5	you.
6	Q. Would it have -- who investigate -- you	6	So we have an hour and 25 minutes left.
7	said you weren't involved in the investigation?	7	we can go until about 7:00. I'm not going t
8	A. No.	8	hold you to that precise time, but I don't w
9	Q. Would that belong to Weldon Bul-	9	to keep the Sheriff here all night.
10	Bullock?	10	MS. ROBINSON: Sheriff White, are you r
11	A. I believe so.	11	to go back on the record.
12	MR. GEIS: Can we take a minute break,	12	THE WITNESS: Yes.
13	please?	13	BY MS. ROBINSON:
14	MS. ROBINSON: You just need	14	you just
15	need a minute?	15	So, Sheriff White, you were telling me
16	MR. GEIS: Yes.	16	about an instance in which an employee was demote
17	MS. ROBINSON: Sure.	17	Do -- do you recall whether or not that instance
18	(BREAK TAKEN)	18	involves an officer asking to see a woman's breas
19	MR. GEIS: Yes, I'm ready. I would like	19	lieu of a ticket?
20	if we're going to calculate the time, then we	20	A. -- No, I don't recall that. No.
21	need to calculate it on the record to this	21	Q. But -- and you don't recall the specifi
22	dispute about it. I'm not going to	22	instance?
23	precise seven-hour limit, but generally	23	hold you to a I don't recall the in lieu of a ticket
24	we're going to get pretty close in	24	part --
25	7:00.	25	Q. Do you recall the deputy asking to see
			woman's breasts part?

Page 130	Page 132
<p>1 A. Yes, that sounds familiar.</p> <p>2 Q. Okay. And then termination of employment</p> <p>3 is pretty explanatory in terms of the policy or the</p> <p>4 di- -- disciplinary action?</p> <p>5 A. Yes.</p> <p>6 MS. ROBINSON: Okay. Let's mark that.</p> <p>7 document -- this document -- we've marked it.</p> <p>8 document as 17, correct?</p> <p>9 COURT REPORTER: Yes.</p> <p>10 MS. ROBINSON: Okay. I am pulling up</p> <p>11 Justin White's Use of Force investigation. A. I don't recall speaking directly to him</p> <p>12 How did we -- what exhibit was that? I may have. I don't recall that.</p> <p>13 document yesterday?</p> <p>14 MR. GEIS: 4.</p> <p>15 MS. ROBINSON: You said the 4?</p> <p>16 MR. GEIS: Well, I haven't seen what you're</p> <p>17 putting up, but if you're talking about Bullock prior to terminating Mr. White about this</p> <p>18 MS. ROBINSON: (Inaudible.)</p> <p>19 MR. GEIS: -- Captain Bullock's three-page</p> <p>20 report, it -- it was 4. If you could put that incident because I was not involved in</p> <p>21 you want to put up, I'll -- I'll tell you investigation.</p> <p>22 the same thing I have.</p> <p>23 MS. ROBINSON: Yes. So it is the you had with Weldon Bullock?</p> <p>24 it's the same thing. It's -- it's Exhibit 4.</p> <p>25 BY MS. ROBINSON:</p>	<p>1 A. I don't recall word for word, but he</p> <p>2 mentioned his findings to me, which included</p> <p>3 recommendation for termination.</p> <p>4 Q. And what did you do next?</p> <p>5 A. Said his services were no longer needed</p> <p>6 after I reviewed what he provided to me, at some</p> <p>7 point, I don't recall the exact date and time, but</p> <p>8 said, Okay, let's tell him that his services are</p> <p>9 longer needed.</p> <p>10 Q. Did you speak to Mr. White before that?</p> <p>11 A. I don't recall speaking directly to him</p> <p>12 that. I may have. I don't recall that.</p> <p>13 Q. Was the termination made effective</p> <p>14 immediately?</p> <p>15 A. I believe so.</p> <p>16 Q. Did you speak to anyone other than Weldon</p> <p>17 Bullock prior to terminating Mr. White about this</p> <p>18 incident?</p> <p>19 No. I don't recall speaking to anyone</p> <p>20 about this incident because I was not involved in</p> <p>21 your investigation.</p> <p>22 Q. Do you recall how long of a conversation</p> <p>23 you had with Weldon Bullock?</p> <p>24 A. No, I do not.</p> <p>25 Q. Would you say it was pretty brief or...</p>
Page 131	Page 133
<p>1 Q. Are you familiar with this document,</p> <p>2 Sheriff White?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Can you state what the document is</p> <p>5 for me, sir?</p> <p>6 A. Administrative investigation complaint,</p> <p>7 Latwanya S. Oliver accused Deputy Justin White.</p> <p>8 Q. Were you involved at all in the</p> <p>9 investigation of Mr. White's use of force, alleged</p> <p>10 use of force?</p> <p>11 A. No.</p> <p>12 Q. Did you convene the panel?</p> <p>13 A. I don't know if the panel was convened or</p> <p>14 not. The purpose of the panel is primarily to look</p> <p>15 for patterns of the -- of using force.</p> <p>16 Q. So you don't know if a panel was</p> <p>17 convened?</p> <p>18 A. No.</p> <p>19 Q. But an investigation was conducted?</p> <p>20 A. Yes.</p> <p>21 Q. Weldon Bullock indicated that he spoke to</p> <p>22 you about his recommendation to terminate Mr. White</p> <p>23 Do you recall that conversation?</p> <p>24 A. Yes.</p> <p>25 Q. What did he say?</p>	<p>1 A. I don't remember how long it was.</p> <p>2 MS. ROBINSON: Okay. So we're -- we're</p> <p>3 going to go into the newer exhibits.</p> <p>4 Can you pull up the Request for Training</p> <p>5 Waiver?</p> <p>6 COURT REPORTER: I'm sorry. What was t</p> <p>7 MS. ROBINSON: It's a document, the Req</p> <p>8 for Training Waiver.</p> <p>9 MR. MCGURL: (Complies.)</p> <p>10 THE WITNESS: Okay.</p> <p>11 BY MS. ROBINSON:</p> <p>12 Q. Can you tell me what this document is?</p> <p>13 A. It's a memorandum from my office to She</p> <p>14 It's addressed to Ms. Diane Konopka,</p> <p>15 director, pertaining to Justin Jamel White. And</p> <p>16 requesting that the commission grant Mr. White a</p> <p>17 Training Waiver and credit him with the BLET</p> <p>18 completed in 2015.</p> <p>19 MS. ROBINSON: Let the record reflect t</p> <p>20 this is Exhibit 18.</p> <p>21 EXHIBIT NUMBER 18 WAS MARKED FOR IDENTIFICATION</p> <p>22 BY MS. ROBINSON:</p> <p>23 Q. Can you tell me the date of this docume</p> <p>24 Sheriff White?</p> <p>25 A. It says June 1st, 2018.</p>

Page 134	Page 136
<p>1 MS. ROBINSON: Let's -- Mr. White's pay raise.</p> <p>2 raise.</p> <p>3 COURT REPORTER: What was the question?</p> <p>4 question?</p> <p>5 MS. ROBINSON: Let's pull up -- pull up Mr. White's pay raise.</p> <p>6 pull up Mr. White's pay raise.</p> <p>7 COURT REPORTER: Oh, sorry.</p> <p>8 MR. MCGURL: (Complies.)</p> <p>9 BY MS. ROBINSON:</p> <p>10 Q. So did Mr. White receive a pay raise?</p> <p>11 A. As far as I know, he did.</p> <p>12 Q. Do you have -- what -- do you have a document in front of you that's dated June 6, 2018?</p> <p>13 document in front of you that's dated June 6, 2018?</p> <p>14 A. Yes.</p> <p>15 Q. Can you tell me what that document says?</p> <p>16 A. It says, "Dear Mr. White; On June 5th, 2018, you satisfied the eligibility period for the first year law enforcement officer salary adjustment. Your annual salary will be \$34,764 effective June 5th, 2018. If you have any questions, please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>17 2018, you satisfied the eligibility period for the first year law enforcement officer salary adjustment. Your annual salary will be \$34,764 effective June 5th, 2018. If you have any questions, please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>18 the first year law enforcement officer salary adjustment. Your annual salary will be \$34,764 effective June 5th, 2018. If you have any questions, please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>19 adjustment. Your annual salary will be \$34,764 effective June 5th, 2018. If you have any questions, please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>20 effective June 5th, 2018. If you have any questions, please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>21 please feel free to give me a call at the number. Sincerely, Argretta R. Johen."</p> <p>22 number. Sincerely, Argretta R. Johen."</p> <p>23 Q. Who was copied on that?</p> <p>24 A. I am. Copied Sheriff Peter White.</p> <p>25 Q. Do you recall Mr. White making any complaints about harassment, discrimination and performance reviews?</p>	<p>2 Q. This is a document that -- do you have a document in front of you that's showing on the screen?</p> <p>3 document in front of you that's showing on the screen?</p> <p>4 screen?</p> <p>5 I want to see it. Yes. Okay. It's -- yes.</p> <p>6 Q. Can you identify this document for me, Mr. --</p> <p>7 Mr. --</p> <p>8 A. This --</p> <p>9 Q. -- Sheriff?</p> <p>10 A. -- is a Notice of Charge of Discrimination from the US Equal Employment Opportunity Commission.</p> <p>11 US Equal Employment Opportunity Commission.</p> <p>12 MS. ROBINSON: And this is -- this is Exhibit 20.</p> <p>13 Exhibit 20.</p> <p>14 (EXHIBIT NUMBER 20 WAS MARKED FOR IDENTIFICATION.)</p> <p>15 BY MS. ROBINSON:</p> <p>16 Q. And can you identify the date on that document?</p> <p>17 It says September 12th, 2018.</p> <p>18 Q. And this was the first time that you learned of Mr. White's allegations of harassment or discrimination?</p> <p>19 Q. And this was the first time that you learned of Mr. White's allegations of harassment or discrimination?</p> <p>20 learned of Mr. White's allegations of harassment or discrimination?</p> <p>21 about discrimination?</p> <p>22 A. Yeah. I see -- are you addressing the performance appraisal or the Title VII, Civil Rights Act one?</p> <p>23 performance appraisal or the Title VII, Civil Rights Act one?</p> <p>24 I'm just addressing any workplace</p> <p>25 I'm just addressing any workplace</p>
Page 135	Page 137
<p>1 about harassment, discrimination and performance reviews?</p> <p>2 reviews?</p> <p>3 A. When I first learned of the harassment situation, that came to me from HR in the form of a complaint to the EEOC. The performance review came to me. I'm not sure whether Mr. White came directly to me or his supervisor did.</p> <p>4 situation, that came to me from HR in the form of a complaint to the EEOC. The performance review came to me. I'm not sure whether Mr. White came directly to me or his supervisor did.</p> <p>5 complaint to the EEOC. The performance review came to me. I'm not sure whether Mr. White came directly to me or his supervisor did.</p> <p>6 to me. I'm not sure whether Mr. White came directly to me or his supervisor did.</p> <p>7 to me or his supervisor did.</p> <p>8 Q. Did you -- so -- so let's -- let me clarify this.</p> <p>9 this.</p> <p>10 Do -- are you saying that you learned of his complaint of discrimination through the EEOC?</p> <p>11 his complaint of discrimination through the EEOC?</p> <p>12 A. No. I'm saying it -- yes. When I learned of this stuff, it was all included in an EEOC complaint that was given to Ms. Johen, the HR director; and she forwarded it -- it to me, by my memory serves me correctly.</p> <p>13 of this stuff, it was all included in an EEOC complaint that was given to Ms. Johen, the HR director; and she forwarded it -- it to me, by my memory serves me correctly.</p> <p>14 complaint that was given to Ms. Johen, the HR director; and she forwarded it -- it to me, by my memory serves me correctly.</p> <p>15 director; and she forwarded it -- it to me, by my memory serves me correctly.</p> <p>16 memory serves me correctly.</p> <p>17 MS. ROBINSON: Michael, let's pull up Mr. White's complaints.</p> <p>18 Mr. White's complaints.</p> <p>19 MR. MCGURL: (Complies.)</p> <p>20 COURT REPORTER: Did you want the last two documents to be marked?</p> <p>21 documents to be marked?</p> <p>22 MS. ROBINSON: Yes. I thought we marked them as 18 and 19.</p> <p>23 them as 18 and 19.</p> <p>24 COURT REPORTER: Okay. Thank you.</p> <p>25 (EXHIBIT NUMBER 19 WAS MARKED FOR IDENTIFICATION.)</p>	<p>2 Mr. White made and made in writing at this moment from Justin White dated June 15th, 2018 --</p> <p>3 Mr. White made and made in writing at this moment from Justin White dated June 15th, 2018 --</p> <p>4 from Justin White dated June 15th, 2018 --</p> <p>5 Yes.</p> <p>6 -- when he -- when he -- in which he was complaining of Title VII, Civil Rights Acts 1964, Gender Discrimination.</p> <p>7 complaining of Title VII, Civil Rights Acts 1964, Gender Discrimination.</p> <p>8 MS. ROBINSON: And let's mark that as Exhibit 21.</p> <p>9 MS. ROBINSON: And let's mark that as Exhibit 21.</p> <p>10 EXHIBIT NUMBER 21 WAS MARKED FOR IDENTIFICATION.</p> <p>11 MS. ROBINSON: Michael, can you pull the EEOC complaints up?</p> <p>12 MS. ROBINSON: Michael, can you pull the EEOC complaints up?</p> <p>13 EEOC complaints up?</p> <p>14 MR. MCGURL: (Complies.)</p> <p>15 BY MS. ROBINSON:</p> <p>16 Q. You have a document in front of you, Sheriff White?</p> <p>17 Sheriff White?</p> <p>18 A. Yes, the Title VII, Civil Rights Act 1964.</p> <p>19 1964.</p> <p>20 Q. Yes.</p> <p>21 A. Yes.</p> <p>22 Q. Do you recognize this document?</p> <p>23 A. Say that again.</p> <p>24 Q. Do you recognize this?</p> <p>25 Yes.</p>

Page 138	Page 140
<p>1 Q. You considered this a complaint?</p> <p>2 A. Yes.</p> <p>3 Q. Who handed you this document?</p> <p>4 A. I don't remember who directly</p> <p>5 me. I believe this may be the one that</p> <p>6 June 26th or something like that. I'm not certain</p> <p>7 the date.</p> <p>8 Q. Will you go to the second page?</p> <p>9 A. Okay.</p> <p>10 Q. The third paragraph?</p> <p>11 A. Okay.</p> <p>12 Q. Will you -- can you read that</p> <p>13 record, sir?</p> <p>14 A. "It should be noted that there</p> <p>15 of discrimination and negligence at the</p> <p>16 office. Upon hire, I begged Lieutenant</p> <p>17 asked for a bulletproof vest for three</p> <p>18 only given one after I approached the command staff</p> <p>19 while they were reading reports in late</p> <p>20 And Captain W. Bullock (S-3) ordered him</p> <p>21 vest. I responded to emergency calls,</p> <p>22 in progress, no vest."</p> <p>23 Q. Can you continue reading the</p> <p>24 paragraph?</p> <p>25 A. "From late June 2018 until August 2018, Q.</p>	<p>Sheriff?</p> <p>2 THE WITNESS: Yeah.</p> <p>3 MR. GEIS: Okay.</p> <p>4 THE WITNESS: Okay. I skimmed it.</p> <p>5 BY MS. ROBINSON:</p> <p>6 Q. So how did you respond when you received</p> <p>7 this document?</p> <p>8 A. I gave him a written response.</p> <p>9 COURT REPORTER: You gave him what kind</p> <p>10 a response?</p> <p>11 THE WITNESS: Written.</p> <p>12 COURT REPORTER: Okay.</p> <p>13 BY MS. ROBINSON:</p> <p>14 Q. Did you do anything in the -- in between</p> <p>15 -- investigate these --</p> <p>16 I believe this....</p> <p>17 Q. Were you surprised by the complaint?</p> <p>18 Yes, I was.</p> <p>19 COURT REPORTER: What was that?</p> <p>20 BY MS. ROBINSON:</p> <p>21 Q. Were you --</p> <p>22 A. Yes.</p> <p>23 Q. -- surprised?</p> <p>24 A. Yes.</p> <p>25 Q. Did you investigate the complaint?</p>
Page 139	Page 141
<p>1 begged for tires on my patrol vehicle to</p> <p>2 nearly eight weeks. I followed the chain</p> <p>3 Sergeant Roberson (S-10), Lieutenant Shearin</p> <p>4 former Captain, now Chief L.D. Bullock (S-2)</p> <p>5 requesting tires. Sergeant Roberson eventually</p> <p>6 me to stop asking and go to the Sheriff</p> <p>7 people don't do their jobs. As I was going to see</p> <p>8 the Sheriff, Captain Bullock asked me what was wrong</p> <p>9 after I walked in his office for the third time, and</p> <p>10 where's your car. He saw the car and went</p> <p>11 Lieutenant Shearin, and I got some tires</p> <p>12 despite both of them knowing I needed tires</p> <p>13 The metal wires were showing on rear tires</p> <p>14 Q. Okay. And what did you do in</p> <p>15 these complaints?</p> <p>16 A. When you said, "these complaints</p> <p>17 everything in this entire memo?</p> <p>18 Q. Yes.</p> <p>19 A. Let me read it for a second.</p> <p>20 Q. And for purposes of this document,</p> <p>21 White, please just kind of skim it.</p> <p>22 A. Okay. Yeah. That's what I'm</p> <p>23 now.</p> <p>24 Okay.</p> <p>25 MR. GEIS: Oh, was that your</p>	<p>for I'm not sure if I investigated this one</p> <p>2 of command may have and responded to him, but there</p> <p>3 several situations going on kind of close together</p> <p>4 But I believe I did.</p> <p>5 Q. What did you -- what did your investigation</p> <p>6 entail?</p> <p>7 A. Let me scan this again.</p> <p>8 I believe this is the one that -- that</p> <p>9 I interviewed all of the individuals that was involved</p> <p>10 of this is the same one pertaining to him changing</p> <p>11 the same day and that type of thing.</p> <p>12 Q. We're talking about the -- the allegations</p> <p>13 of the -- the -- the harassment -- well, the tire</p> <p>14 discrimination, the pattern of discrimination and</p> <p>15 the -- the comments that you just read. What did</p> <p>16 you do in response to those comments? What type of</p> <p>17 investigation did you perform, if any?</p> <p>18 A. I don't recall exactly what I did step</p> <p>19 step because it's been over a couple years ago, but</p> <p>20 whether it was investigated. I'm not sure if I</p> <p>21 investigated it or not. I believe I did.</p> <p>22 Q. So is your testimony that you -- you</p> <p>23 investigated, but you can't recall the</p> <p>24 investigation?</p> <p>25 A. Again, I'm -- I'm not sure if I</p>

Page 142	Page 144
<p>1 investigated it. I believe that I did, 2 recall all the details because there were 3 things going on, and it's been a couple 4 retired. 5 Q. Okay. Do you recall -- do you 6 someone in your department or office may have 7 investigated it? 8 A. I don't. I believe -- like I 9 sure if I investigated it. If I did, it 10 in my written response. 11 Q. Do you recall reviewing a statement 12 Durwood Campbell as it pertains to Mr. White? 13 A. I believe so. 14 MS. ROBINSON: Okay. We'll 15 I have that statement. Let's pull 16 up. 17 MR. MCGURL: (Complies.) 18 BY MS. ROBINSON: 19 Q. Do you recognize this document? 20 A. Yes. 21 Q. And can you identify this document? 22 A. It was written by Durwood Lee 23 July 18, 2018. 24 Q. What is this document? 25 A. What was the question?</p>	<p>1 -- well, or much earlier. 2 So this was written apparently after the 3 years incidents were alleged to have happened. 4 Q. So how do you interpret that first 5 paragraph? 6 A. It looks that a complaint had been made 7 Deputy J.J. White saying that Deputy White was -- 8 said Campbell told Deputy White, "Didn't I tell your a 9 was not included that anymore." 10 Q. Right. Well, let's talk about the first 11 paragraph. How do you interpret the first 12 paragraph? 13 A. Statement regarding accusation made by 14 I think there had been a complaint made at some point 15 that statement accusation made at some point by Deputy 16 White. 17 Q. So did -- do you read this to understand 18 that Captain White requested that Campbell write 19 statement regarding a previous incident? 20 A. Yes, Captain Watkins. 21 Q. Okay. And that that previous incident 22 occurred in January of 2018; is that correct? 23 A. Yes, sometime back in January according 24 this. 25 Q. And does the document show that the</p>
Page 143	Page 145
<p>1 Q. What is this document? 2 A. Again, I didn't quite understand you. 3 Q. What is this document? 4 A. Oh. It's a statement regarding 5 made by Deputy J.J. White from Durwood Campbell 6 MS. ROBINSON: Okay. Let's mark this -- 7 did we -- did I already mark this as Exhibit 22? 8 COURT REPORTER: No. 9 MS. ROBINSON: Let's mark this as Exhibit 10 22. 11 (EXHIBIT NUMBER 22 WAS MARKED FOR IDENTIFICATION.) 12 BY MS. ROBINSON: 13 Q. Can you read the date of this statement? 14 A. July 18, 2018. 15 Q. Can you read the first paragraph? 16 A. "On Monday, July 16th, 2018, 17 contacted by Captain Watkins and requested 18 statement in reference to the previous 19 involving Deputy White and myself from 20 January." 21 Q. Is it -- is it typical that a statement be 22 written seven months later? 23 A. Well, no, it's not typical unless 24 accusations were made much later -- 25 Q. Explain that.</p>	<p>1 statement was written in July of 2018? 2 A. Yes, it's dated July 18, 2018. 3 Q. According to the policy, aren't 4 investigations and documents and statements to be 5 drafted at the time of the incident? 6 A. At the time or in close proximity to. But I don't recall exactly when J. 7 White made his complaint to whoever he made it to 8 White made his complaint to whoever he made it to 9 as Exhibit 22, but I became aware of when he submitted 10 this stuff to me. 11 Q. And so you were -- you were saying that 12 did respond to Mr. White's complaints, his -- his 13 statement complaints that were made -- 14 A. Yes, I believe I did. If they were 15 addressed to me, I believe I did respond. 16 Q. And you responded via letter, correct? 17 A. Yes. If I remember correctly, there were 18 no letters, but I don't remember which letter we 19 back with what. I would have to see the letter. 20 MS. ROBINSON: Okay. Michael, can you 21 the letter? 22 MR. MCGURL: (Complies.) 23 THE WITNESS: Okay. 24 BY MS. ROBINSON: 25 Q. Can you identify this document, Sheriff</p>

Page 146	Page 148
<p>1 White?</p> <p>2 A. It's a letter written by me to Deputy Justin J. White.</p> <p>3</p> <p>4 Q. And is that -- is that your signature? Q. So where did you meet with Mr. White at</p> <p>5 A. Yes.</p> <p>6 MS. ROBINSON: Let's mark this as Exhibit 23.</p> <p>7</p> <p>8 (EXHIBIT NUMBER 23 WAS MARKED FOR IDENTIFICATION BY MS. ROBINSON:</p> <p>9</p> <p>10 Q. Can you tell me the date of that letter?</p> <p>11 A. July 19, 2018.</p> <p>12 Q. And what was your -- what was the ultimate finding that you made in this letter?</p> <p>13 A. It would be in this letter. I read it right quick.</p> <p>14 Okay. Basically they were unfounded.</p> <p>15</p> <p>16 Q. "They" as in -- for the record --</p> <p>17 can you explain --</p> <p>18 A. Yes.</p> <p>19</p> <p>20 Q. -- who "they" is?</p> <p>21 A. He -- he alleged several different things in here. And I remember speaking with Lieutenant Campbell about this, and Lieutenant Campbell was disciplined for using the word "ass" when talking with Deputy White. He -- and it also says</p>	<p>1 of that meeting, I gave him a copy. So I'm not sure if this -- this may be the one or it may be the other one. I don't know.</p> <p>2</p> <p>3</p> <p>4</p> <p>5 Was it....</p> <p>6 As Exhibit 23. It would have been in my office.</p> <p>7 Q. And after you met with Mr. White and handed him the letter, did you receive any other</p> <p>8</p> <p>9 complaints?</p> <p>10 A. I would have to look and see again.</p> <p>11 There's another letter that I addressed to him regarding some type of complaint or allegations, I believe. Well, no, this was on the --</p> <p>12</p> <p>13</p> <p>14 Q. So at -- at some --</p> <p>15 A. -- was on his performance appraisal as well, and they came fairly close together.</p> <p>16</p> <p>17 Q. At some point you received a -- the EEOC</p> <p>18 complaint, correct?</p> <p>19 A. Yes, from HR.</p> <p>20 MS. ROBINSON: And we marked that as Exhibit 20.</p> <p>21</p> <p>22 Lieutenant MR. GEIS: Sheriff, right here. I just didn't put a number on it.</p> <p>23</p> <p>24 BY MS. ROBINSON:</p> <p>25 that -- Q. And you said HR forwarded you this</p>
Page 147	Page 149
<p>1 that -- that explains that his suspension was</p> <p>2 out.</p> <p>3 Q. How was Lieutenant -- Lieutenant Campbell</p> <p>4 disciplined?</p> <p>5 MR. GEIS: Objection. He can't answer that.</p> <p>6</p> <p>7 MS. ROBINSON: What's the objection?</p> <p>8 MR. GEIS: It's a statutory objection, 153A-98. It's a personnel record.</p> <p>9</p> <p>10 BY MS. ROBINSON:</p> <p>11 Q. What was the outcome of your Title VII</p> <p>12 investigation, or did -- if you conducted one?</p> <p>13 A. Well, this is -- was included in the Title VII Civil Rights Act of 1964.</p> <p>14</p> <p>15 Q. So you concluded that there was no</p> <p>16 discrimination?</p> <p>17 A. No. None that I could see.</p> <p>18 Q. Okay. And so who sent Mr. White that</p> <p>19 letter? How did Mr. White receive that letter?</p> <p>20 A. I don't know if this is the one that he gave to him personally after talking to him. There were two letters that I wrote in response to him concerning a complaint. I don't remember I remember one of them concerning the Title VII stuff. But in this one dated July 19 alleging discrimination. I met with him myself where he talked about his suspension and traffic Chief Deputy Lawrence Bullock. And at the conclusion</p>	<p>1 complaint?</p> <p>2 A. Yes, I believe so.</p> <p>3 Q. Can you identify the date of this</p> <p>4 complaint, again?</p> <p>5 A. I see the date, but I can't -- I can't answer that.</p> <p>6 It. This is a copy. It's faded. I'm sorry.</p> <p>7 There's a date at the bottom.</p> <p>8 Q. Yes.</p> <p>9 A. 9/12/2018.</p> <p>10 Q. And what did you do when you received the</p> <p>11 Title VII complaint?</p> <p>12 A. This is -- this was investigated. I believe that he filed two different complaints, one -- he filed one, and there may be an amended one or something with EEOC, is what I'm thinking.</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Q. So you said you investigated this</p> <p>17 complaint?</p> <p>18 A. I believe so. I don't recall. Like I said, he's filed several things all together. But I believe that I -- I believe this goes with this letter that I sent, but there's also another letter that I sent him concerning a complaint. I don't remember the details of it. But in this one dated July 19, 2018, he talked about his suspension and traffic stops and stuff like that.</p>

Page 150	Page 152
<p>1 Q. Okay. Well, let's focus on Exhibit 20, the 2 -- the September 12th, EEOC complaint. 3 And so I just would like to know what -- 4 what steps did you take when you received this 5 complaint? 6 A. The Exhibit 20? 7 Q. Yes, sir. 8 A. This was -- I believe this was 9 investigated by me. And if it in fact was, 10 was given -- no. Actually this -- this 11 investigated right here. This -- when 12 EEOC, that complaint contained a lot of 13 that's in this memo that I gave him. 14 Q. The memo -- the memo came before the 15 complaint? 16 A. Yes, it did. 17 Q. Okay. So what did you do -- 18 A. From the EEOC. 19 Q. Right. Exactly. 20 A. Yeah. 21 Q. So what did you do when you received the 22 EEOC's complaint? 23 A. I don't recall specifically what I did, but 24 I believe I conducted an investigation into 25 allegations.</p>	<p>2 Q. That's fair enough. 3 So the Use of Force Report -- but then 4 this after you conducted -- or you -- you may or may 5 not have done anything in response to the EEOC 6 complaint. Is -- 7 A. I'm sure I gave some kind of response. 8 What was Q. Would that have been a written response 9 Yes. 10 -- or would that have gone to Mr. White 11 A. Would that have gone to -- yes, at some 12 the point. I'm not sure if this is the one that I ha 13 here or -- this is in response to your complaint 14 dated June 15th, 2018, received on June 26th, 15 whichever one that was. 16 Q. Okay. So did -- were you -- were you 17 shocked to see Mr. White's EEOC complaint? 18 A. Well, I wouldn't say I was shocked, but 19 was surprised. 20 Q. You were surprised? 21 A. Yes. 22 Q. Why were you surprised? 23 What I did, but Because some of the stuff that he alleg 24 Dnto his included in this response that I gave him, and 25 didn't see where that was discrimination.</p>
Page 151	Page 153
<p>1 Q. Did you interview witnesses? 2 A. Yes. If this is the same one, I believe 3 interviewed everybody that was involved. 4 of drawn out, and he talked about the different 5 supervisors that he was with during his training 6 different squads and shifts that he was on, if that's 7 is the same situation. 8 Q. Did you solicit statements? 9 A. Yes. 10 Q. Who did you ask to write a statement? 11 A. I believe -- again, if it's the same 12 complaint, then I believe it to be that 13 basically everybody that was involved in 14 training. If I remember correctly, Captain Watkins, 15 Lieutenant Campbell, Sergeant Martin, Deputy Evans, 16 pretty much every -- the ones that were involved 17 his training; again, if this is the situation I think 18 it is. 19 Q. Would you say that you followed the policy, 20 the policies that we discussed? 21 A. Yes, as best I could. But, again, this 22 I don't remember all the details, and I don't 23 remember which complaint came in at what time because 24 he -- there was several things filed by him at 25 together, and that's been a little bit</p>	<p>1 Q. Okay. So did your relationship change 2 Mr. White after the filing -- he filed the EEOC 3 complaint? 4 A. Well, no. I never had any relationship 5 other than same as with the rest of the members of 6 on, if that's the sheriff's office deputies. 7 Q. Is he the only employee who has ever fi 8 an EEOC complaint? 9 A. Yes, to my knowledge. Yes. 10 Q. Under your tenure? 11 A. Yes. 12 Q. Did any of your superiors or anyone con 13 you and ask about or inquire about the complaint? 14 MR. GEIS: Objection to form. 15 DEPUTY EVANS, ROBINSON: 16 Q. Did anyone inquire about this complaint 17 The EEOC complaint? 18 Q. Yes. 19 I believe the HR director may have inqu 20 about it. 21 Q. And who is the HR director? 22 A. Argretta Johen. 23 Q. And she's the only one who inquired abo 24 him at 25 over two years When you say -- when you say "superior,</p>

Page 154	Page 156
<p>1 really she's not -- you know, she doesn't 2 me, but I know that she inquired about it. 3 Q. Is she the only -- it doesn't 4 be, you know, a superior. 5 Is she the only person who inquired about 6 it? So we're just speaking generally now. 7 A. Okay. I don't recall anybody 8 and inquiring about the EEOC complaint, 9 Q. Did Mr. White make any additional 10 complaints after the September 12th EEOC 11 A. He made several complaints. 12 than one that I recall, but I don't recall the 13 sequence in which they were made. Again, 14 long time ago, near almost three years 15 Q. After the September 12th EEOC 16 did Mr. White make any additional complaints? 17 A. I don't know. 18 Q. Do you recall when you terminated 19 date you terminated Mr. White? 20 A. I would have to look at whatever document 21 it's documented on. 22 MS. ROBINSON: Let's pull up 23 termination. 24 MR. MCGURL: (Complies.) 25 MS. ROBINSON: We pull -- we</p>	<p>1 supervise Michael, can you pull that up? 2 MR. MCGURL: (Complies.) 3 THE WITNESS: This is October 21st, 201 4 when it occurred or when it began. 5 BY MS. ROBINSON: 6 Q. Okay. So, Sheriff White, I want to ask 7 ask you about some behaviors that took place at t 8 at sheriff's office when you were there. And I want 9 al to -- do you recall any rumors that were made abo 10 Mr. White or said -- 11 No, I do not. 12 Q. Do you -- do you recall an instance for 13 it which comments were made about Mr. White's sexual 14 orientation? 15 A. No, I do not. 16 Q. Do -- do you recall Mr. White complaini 17 about the difference in treatment between the bla 18 and white deputies? 19 A. Yes, at some point he alleged that. 20 Q. How did -- how do -- so you don't recal 21 any statements about Mr. White's sexuality? 22 A. No, none that I heard. 23 Q. What about comments that others may hav 24 made? 25 He at some point made some allegations</p>
Page 155	Page 157
<p>1 that document earlier, and I'm looking for 2 thought we marked it. I think it was Exhibit 10 3 BY MS. ROBINSON: 4 Q. Can you read in the record the date of 5 termination? 6 A. Yes. Date of separation, October 24, 2018 7 Q. Do you recall how close that was to the 8 in time to the investigation of Mr. White's use of 9 force -- alleged use of force? 10 A. No, I didn't calculate the time. 11 Q. Let's -- let's do that now. 12 Can you turn to the -- the Use of Force 13 exhibit? 14 COURT REPORTER: Turn to what 15 MS. ROBINSON: The Use of Force Report, 16 investigation report. 17 BY MS. ROBINSON: 18 Q. Can you read for the record the date on 19 that document? 20 A. The -- 21 MR. GEIS: What document are we 22 about? 23 MS. ROBINSON: The Use of Force Report. 24 MR. GEIS: Do you mean the investigation 25 MS. ROBINSON: Well, investigation</p>	<p>1 that type of stuff may have happened, but I didn't 2 Exhibit 10 remember correctly, this was after -- it 3 surfaced long after he said that it happened. 4 Q. What do you mean that it surfaced? 5 A. It did not come to my attention when he 6 that that occurred. It was later. 7 Q. How did it come to your attention? 8 I believe it came in his complaint. 9 Q. Did anyone investigate these allegations? 10 A. This may be the one I investigated. I' 11 not sure. 12 Q. And we're specifically talking about 13 statements about his sexual orientation? 14 A. Yeah, and these came out -- a lot of th 15 stuff came out in his EEOC complaint, if I rememb 16 correctly. 17 Q. Anyone admit to making those statements 18 A. No. 19 Q. Did anyone say they heard those stateme 20 being made? 21 A. Excuse me. I didn't hear you. 22 Q. Did anyone say that they heard those 23 statements being made? 24 A. No. I believe Mr. White alleged that i 25 some of his complaint.</p>

<p style="text-align: right;">Page 158</p> <p>1 Q. Did you investigate those statements?</p> <p>2 A. Yes, I believe so.</p> <p>3 Q. What did you do?</p> <p>4 A. In this one, this -- I spoke to some of the</p> <p>5 people that he said was involved, and then I believe</p> <p>6 maybe a lieutenant, captain or somebody spoke to</p> <p>7 somebody or something to that. Again, this stuff</p> <p>8 kind of runs together. So it -- I would have to look</p> <p>9 at my documents to refresh my memory.</p> <p>10 Q. Are there -- were there any openly gay</p> <p>11 deputies?</p> <p>12 A. No, not to my knowledge.</p> <p>13 Q. And when you say not to your knowledge, are</p> <p>14 we speaking about the entire -- your entire tenure</p> <p>15 A. Yes, I -- I am.</p> <p>16 Q. -- as sheriff?</p> <p>17 A. Yes.</p> <p>18 MS. ROBINSON: Can I -- let's take a</p> <p>19 five-minute break. I think I'm almost done.</p> <p>20 MR. GEIS: Okay.</p> <p>21 (BREAK TAKEN)</p> <p>22 MS. ROBINSON: At this point, Sheriff</p> <p>23 White, I just want to thank you for your time.</p> <p>24 Thank you for sitting through this long</p> <p>25 deposition. I don't have any further questions</p>	<p style="text-align: right;">Page 160</p> <p>1 STATE OF NORTH CAROLINA</p> <p>2 COUNTY OF CATAWBA</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 I, Dodie F. George, a Notary Public, do</p> <p>6 hereby certify that there came before me on</p> <p>7 Friday, February 26, 2021, the person</p> <p>8 hereinbefore named who was by me duly sworn to</p> <p>9 testify to the truth and nothing but the truth</p> <p>10 of his or her knowledge concerning the matters in</p> <p>11 controversy in this cause; that the witness was</p> <p>12 thereupon examined under oath, the examination</p> <p>13 reduced to typewriting under my direction, and the</p> <p>14 deposition is a true record of the testimony given</p> <p>15 by the witness.</p> <p>16 I further certify that I am neither</p> <p>17 attorney or counsel for, nor related to, or employed</p> <p>18 by any attorney or counsel employed by the parties</p> <p>19 hereto or financially interested in the action.</p> <p>20 IN WITNESS WHEREOF, I have hereto set my</p> <p>21 hand this 9th day of March, 2021.</p> <p>22</p> <p>23 <i>Dodie F. George</i></p> <p>24 Dodie F. George, Notary Public</p> <p>25 Notary Public Number 201025200033</p>
<p style="text-align: right;">Page 159</p> <p>1 for you.</p> <p>2 THE WITNESS: Okay.</p> <p>3 MR. GEIS: Thank you.</p> <p>4 (SIGNATURE RESERVED)</p> <p>5 (DEPOSITION CONCLUDED AT 6:41 P.M.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 161</p> <p>1 Errata Sheet</p> <p>2 NAME OF CASE: 5:19- JUSTIN J. WHITE vs PETER WHITE</p> <p>3 DATE OF DEPOSITION: 02/26/2021</p> <p>4 NAME OF WITNESS: Peter White, 30(b)(6)</p> <p>5 Reason Codes: 1. To clarify the record.</p> <p>6 2. To conform to the facts.</p> <p>7 3. To correct transcription errors.</p> <p>8 Page ____ Line ____ Reason ____</p> <p>9 From ____ to ____</p> <p>10 Page ____ Line ____ Reason ____</p> <p>11 From ____ to ____</p> <p>12 Page ____ Line ____ Reason ____</p> <p>13 From ____ to ____</p> <p>14 Page ____ Line ____ Reason ____</p> <p>15 From ____ to ____</p> <p>16 Page ____ Line ____ Reason ____</p> <p>17 From ____ to ____</p> <p>18 Page ____ Line ____ Reason ____</p> <p>19 From ____ to ____</p> <p>20 Page ____ Line ____ Reason ____</p> <p>21 From ____ to ____</p> <p>22 Page ____ Line ____ Reason ____</p> <p>23 From ____ to ____</p> <p>24</p> <p>25 PETER WHITE, 30(B)(6)</p>

Page 162

WITNESS CERTIFICATION

1 WITNESS CERTIFICATION

2

3 I hereby certify that I have read the

4 foregoing transcript of my deposition testimony,

5 and that my answers to the questions propounded,

6 with the attached corrections or changes, if

7 any, are true and correct.

DATE _____

PETER WHITE, 30 (B) (6)

PRINT NAME

JOB 408577

5:19- JUSTIN J. WHITE vs PETER WHITE



(866) 715-7770
advancedONE.com

Exhibits	10 56:21 57:17 58:4 155:2	1977 7:11,24	23 146:7,8
Exhibit 12 3:10 71:13,14	100 78:19	1981 8:18	24 155:6
Exhibit 13 3:11 79:5,6	11 59:18,19	1985 9:1,14	25 129:6
Exhibit 14 3:12 89:11,12	12 50:4 61:2 71:13, 14	1990 9:17	26th 138:6 152:14
Exhibit 15 3:13 101:17,18	12-hour 41:21	1992 12:9	27553 6:12
Exhibit 16 3:14 106:11	12-month 99:4	1998 11:10	3
Exhibit 17 3:15 112:9,11	12-year 51:10	19th 149:23	3 85:17
Exhibit 18 3:16 133:20,21	12/5/55 6:8	1:30 67:2	30(b)(6) 4:2
Exhibit 19 3:17 135:25	12:30 66:18	1st 133:25	34 129:2
Exhibit 20 3:18 136:13,14 148:21 150:1,6	12th 136:18 150:2 154:10,15	2	4
Exhibit 21 3:19 137:10,11	13 13:6 79:5,6	2 116:13	4 86:25 130:14,15, 20,24
Exhibit 22 3:20 143:7,9,10,11	14 89:11,12	20 10:19,20 98:11 136:13,14 148:21 150:1,6	40 19:11
Exhibit 23 3:21 146:6,7,8	15 71:25 80:1 89:9 101:17,18	2005 16:7,9	40-something-thick 72:20
\$	153A-98 147:9	2006 16:8,15 18:4,5 20:9	5
\$1,500 134:18	15th 101:9 113:11 137:4 152:14	2007 71:22	5 78:3,6 88:1
\$34,764 134:19	16 91:11,12,13 98:24 106:11	2008 71:22	50 98:12
1	168A-3 114:12	2009 71:25 80:1 101:9 113:11	50B 78:9,16
1 56:20 57:8 73:1 81:1	16th 143:16	2015 133:18	5th 134:16,20
	17 91:12 98:25 112:9,10,11 130:8	2017 138:19	6
	18 112:9 133:20,21 135:23 142:23 143:14 145:2	2018 133:25 134:13,17,20 136:18 137:4 138:25 142:23 143:14,16 144:22 145:1,2 146:11 152:14 155:6 156:3	6 73:20 134:13
	19 135:23,25 146:11	21 137:10,11	60 6:10
	1964 137:7,19 147:14	21st 156:3	6:41 159:5
	1976 7:10	22 143:7,10,11	6A 41:23,24
			6P 41:24

7	23 111:7 114:22,25 115:2,7,15 123:19 125:18 127:22,24 129:4,7,15 130:17 131:22 132:17,20 135:1 141:12 144:10 146:23 149:24 151:4 153:13,16,20,23 154:2,5,8,25 155:22 156:7,9,13, 17,21,23 157:12,13 158:14	137:18 147:14 acting 26:6 action 56:25 58:17 101:21 102:12 114:5,14 115:23 116:2 120:22 121:1 123:22 125:6,8 126:12 130:4	37:13 administrative 24:10,19 26:18 27:4,14,19 28:9 29:13,22 30:1,4 32:3 95:22 131:6
8	above 134:21	actions 48:5 61:25	administrator
85 9:15	above-mentioned 92:9	activities 27:21 65:17	27:10
9	accepted 107:17, 21 108:3,9	activity 26:9	admit 157:17
9/12/2018 149:9	accepting 107:15, 24 109:14	Acts 137:7	Adverse 101:21
A	access 72:13	actual 40:17 72:23 84:12 123:15	advising 5:2
A.1 69:24 70:18 71:4	accompanying 91:25 93:2 97:6	actually 10:5 12:7 15:6 51:7 61:25 63:16 150:10	affair's 99:8
A.1. 71:13	accordance 94:20 95:8	added 20:14,15	affairs 97:15 99:7, 12,15
A.2 69:24	according 144:23 145:3	addition 15:11 91:24	affected 88:21 92:8
ability 13:18	accusation 144:13, 15	additional 97:9 154:9,16	afford 72:20 84:13 88:11
able 11:22 21:11,12 40:23 89:5,6	accusations 110:3, 4 143:4,24	address 4:25 6:9 78:9	afforded 88:5,6,16
about 4:15 5:2 8:7, 15 9:7 11:9 15:5 16:16 18:18,22 19:11,17 22:20 23:25 34:9 37:20, 21 43:19 45:11,18 46:19 50:14 51:13 54:9 55:23 62:8,14 63:2 64:5 66:9,10 67:7 68:19 69:1 71:21 72:24 74:18 86:13,15 92:2 96:25 99:23 105:2, 6,7,13,16 108:11 109:22 110:5,8,20,	accused 131:7	addressed 94:16 95:15 133:14 145:15 148:11	African-american 21:8 after 9:19 11:12 12:18 14:15 17:21 21:7 31:5,18,24 33:7 34:17 35:16 37:17 40:25 42:2 44:2 45:6 55:3 56:3 58:25 59:5,21 61:25 62:1 71:23, 24 74:1 111:19 132:6 138:18 139:9 144:2 147:21 148:7 152:4 153:2 154:10,15 157:2,3
	acknowledging 46:15	addresses 117:8	afterwards 46:14
	acquainted 112:17	addressing 136:22, 25	again 18:4 25:5 37:5,8 38:20 44:8 45:4 49:15 54:25 55:15 67:23 69:7 99:16 103:22
	across 15:9,12 122:8	adjoining 38:8	
	act 75:15 136:24	adjust 117:4	
		adjustment 134:19	
		administered 88:20	
		administration	

104:23,24 108:13 116:25 118:23 121:13,20 124:21 137:23 141:7,25 143:2 147:21 148:10 149:4 151:11,17,21 154:13 158:7 against 17:12,24 84:23 106:22 121:1 age 114:11,16 agents 84:5,8 aggravating 12:15 ago 141:19 152:1 154:14 agony 16:23 agree 46:12 73:11, 12 74:6 105:23 agreeing 4:10 ahead 23:4 50:19 aid 88:20 all 5:6,20 16:23 17:9 18:18,25 19:25 34:13,18,19 35:17 48:3 50:6 55:1 62:21,22 65:6 81:4 82:22,24 84:10 96:1 97:5 98:23 102:4,18 104:23 106:5 113:20 114:4 115:17 118:15 123:19 124:6 128:24 129:9 131:8 135:13 141:9 142:2 149:19 151:22 allegations 47:11 53:4 104:9 136:20 141:12 148:12 150:25 156:25	157:9 alleged 104:9 117:15 131:9 144:3 146:21 152:23 155:9 156:19 157:6,24 allegedly 121:18 126:8 alleging 147:24 allocation 84:12 allowed 17:23 114:23,25 115:3 almost 124:6 154:14 158:19 alone 65:18 along 16:23 35:7 46:16 55:24 65:15 80:11 93:1 already 52:2,6 143:7 also 10:3 15:10,11 17:4 26:5 33:24 42:12 43:2 58:23 59:5 82:23 83:5 89:1,10 90:5 92:21 93:15 94:3 101:23 120:4 146:25 149:21 Although 78:9 always 6:13 38:15 73:7 Alzheimer's 26:14 am 5:22 6:3 52:6 118:9 130:10 134:24 158:15 amended 149:14 Amendments 73:6	among 57:18,22,24 73:5 amount 25:21 88:14 an 12:16 18:21 20:20 24:25 25:23 28:1 30:3,22 33:13 37:17,23 38:8,14 39:1,16 42:13 45:24 46:6,24 47:7, 9,10,12,14,15,20, 23,24 48:2,6,7,8 49:10,13,19,20 50:2,3,7,14,16 51:6,7,16 52:24 55:25 58:5,22,23 60:1,10,15 64:10 65:6,20 66:24 67:14,18,21 68:15 69:16 72:12 77:23 81:11 82:13,15 84:13 86:1,2 90:17, 21,23 91:9 92:2 95:13 99:15 103:22,23 104:4, 17,23 105:4,18 106:17 109:24 113:21 114:4,15 115:13,20 116:1 117:1,16,18 118:3 119:2,9,22 120:2 121:25 122:14 123:4,8,13 125:14, 16,19 126:12,17 129:6,15,17 131:19 135:13 144:15 149:14 150:24 153:8 156:12 analyzed 97:6 and 4:10,11,14,16, 19,20,23 5:3,11,13, 20 6:4,9,16,25 7:10,16,17 8:8,14,	20 9:7,13,20,21 10:10,13,24 11:1,3, 4,7,10,13,15,16,19, 22,23,25 12:1,7,14, 15,18,22,24,25 13:4,5,18,19,25 14:8,14,16,17,19 15:7,10,14,16,19, 20,22,25 16:1,3,10, 12,19,22 17:4,9,20, 23 18:4,15,18,23 19:6,14,17,25 20:8 21:7,19 22:18,22 23:4,10,14,17 24:9, 11 25:4,11,12,17, 18,21,22,25 26:3,5, 7,12,16,24 27:14, 18 28:11 29:7,13, 19,23 30:3,7,16,25 31:5,7 32:4,5,9,17, 20 33:18,20,23,24 34:1,4,8,11,12,16, 17,19,20,22,23 35:13,14,18 37:7, 22 38:3,21 39:11, 12,19 41:5,9,18,24 42:4,12,14 43:2 44:2,4,5,17,18 45:2,6,8,22,23 46:2,9,14,17 47:3, 18 48:14,25 49:2, 15,19 50:5,11,12, 14,16 51:7,18,19 52:2,25 53:14,15, 25 54:1,3,4 55:3,23 56:4,9,10,14 57:20 58:15,18,21,23 59:5,7,14 61:2,24, 25 62:23,24 63:3,8, 15,20 64:22 65:5,6, 13,24 67:13,15,20 68:18,25 69:1,14, 24 70:4,15,20 71:12 72:6,15,23 73:3,6,8,9 74:5,6,
---	---	--	---

22,25 75:3 76:12, 15,20 77:5,19,22 78:21,25 79:18,24 81:13,16 82:11,22 83:7,12 84:1,8,12 85:4,22 87:11,20 88:11,13,14,19,25 89:10 90:12,13 91:1,8,19,25 92:1, 3,5,8,21 93:1,14 94:3,19,22 95:4,8, 22 97:5,6,9,24 99:8 101:21 102:1,2,4,5, 12 103:4,6 104:3,4, 6,24 105:11 106:5, 22,23 107:7,15,21 108:3,8,9,16,18,19, 25 109:11,22 110:1,17 111:5,10, 11,24 112:21,24 113:3,5,22 114:3,4, 6 117:4,5,23 118:4 119:10 121:19 122:8 123:21 124:17,25 125:3,20 128:4,10,12,13 129:2,6,20 130:2 132:4,7 133:15,17 135:1,15,23 136:12,16,19,20 137:2,8,9 138:15, 17,20 139:3,6,9,10, 11,14,20 141:2,11, 14 142:3,21 143:17,19 144:21, 25 145:4,11,16 146:4,12,22,23,25 147:18,24,25 148:7,10,16,20,25 149:10,14,24,25 150:3,9 151:4,5,6, 22,25 152:24 153:13,21,23 154:8 155:1 156:8,18 157:2,12,14 158:5,	13 animals 84:15 annual 43:15,18 65:6 134:19 another 10:24 14:1, 6 21:8 27:12 29:10 36:25 52:7,10 56:9 57:11 65:21 81:12 86:18 120:3 124:14 148:11 149:21 answer 4:10 5:3 37:5 50:22 52:2,5,9 64:2 147:5 answered 32:15,19 51:18 52:3,7 104:25 answers 31:5 anticipate 69:3 anticipated 69:7 any 5:4,25 13:12,15 17:2 19:15 20:3 27:5 30:12,16 42:20,22,23 58:24 61:17 65:2,17 67:8 69:14 70:9 73:9 84:14 86:4 88:17 89:22,24 90:1,7 91:25 96:7,8,10,11 97:9 102:7,15 109:2 115:23 116:19 117:14 118:7,9,18 119:7,8, 10,21,24 122:4 123:2,9 134:20 136:25 141:17 148:8 153:4,12 154:9,16 156:9,21 158:10,25 anybody 154:7 anymore 144:9	anyone 14:25 132:16,19 153:12, 16 157:9,17,19,22 anything 21:22 55:5 103:5 118:6 119:11 140:14 152:5 anywhere 118:2 122:23 ap- 38:3 apology 115:20 116:1 apparent 99:10 apparently 144:2 Appeal 101:22 appeared 95:13,16 applicable 93:3 applicant 31:4 32:10,15 33:11,13 34:2 36:21 37:18 38:4,14 39:1 applicants 30:7,9, 25 application 24:3,5 30:3 84:12 applications 24:7 applies 92:1 apply 24:2,4 78:15, 20,22,23 109:25 applying 33:20 appoint 97:11 appointed 95:18 appraisal 43:14 45:5,9,13,16,17 46:15 105:19,20 106:3 136:23	148:15 appraisals 43:8 appreciate 4:12 appreciated 64:23 approach 83:12 approached 138:18 appropriate 42:14 88:23 94:18 114:5 are 5:19,23 7:15 16:22 19:25 21:3,7 25:19 37:23 41:2 48:1 49:15 50:20 52:4 53:24 57:7 59:18,25 60:2,3,6, 14 62:8 64:4 66:9, 10,15 70:20 72:1 74:18 78:11,13 80:20 82:13,23,24 83:2,4,5,21 98:23 99:11,14 112:13 113:20 119:6,19 123:6 125:14 126:10 128:20 129:10 131:1 132:8 135:10 136:22 155:21 158:10,13 areas 39:3 45:22 aren't 5:24 111:2 145:3 Argretta 134:22 153:22 arm 62:7 73:9 around 9:15 12:9 40:23 arrest 78:16 81:13 arrested 23:17 arrests 26:9
---	---	---	---

<p>arrival 48:17</p> <p>article 73:1,20 74:10,20 78:3,6 81:1 102:3</p> <p>as 4:3,13,17,23 10:24 11:22 12:13 14:9,18 15:9,13,17 17:10,24 23:6 24:4, 16,17 26:6,15,22 28:18 31:8 32:9 33:19,21 34:10 35:21 37:13 38:25 39:7,12 40:21 41:3 48:24 50:5 52:15, 19 57:8 59:2 60:13 62:20 65:16 68:20, 24 69:8,12 72:3 74:5 75:15 77:21 78:14 80:19 84:16 87:20 88:10,17,23 90:12,17 92:1,18 95:15,22 96:13,16 97:14,23 101:17 102:22 103:1,2 104:10 105:18,20 108:1 114:2,12 116:9 118:25 123:1 125:7 128:4 130:8 134:11 135:23 137:9 139:7 142:12 143:7,9 146:6,17 148:15,20 151:21 153:5 158:16</p> <p>ask 31:19 72:23 96:6 108:15,16,18, 19 112:15 128:16 151:10 153:13 156:6,7</p> <p>asked 17:20 46:15 49:2 51:18 53:13 100:22 101:2 103:12,24 123:6 138:17 139:8</p>	<p>asking 49:10 105:6 129:17,24 139:6</p> <p>ASP 82:21</p> <p>aspects 98:18</p> <p>ass 144:8 146:24</p> <p>assault 90:18,21, 23,24 91:22</p> <p>assaulting 90:8</p> <p>assess 87:5,19</p> <p>assign 99:6</p> <p>assigned 9:2,21 12:24 14:16 34:5 36:7 41:2,6 42:2,9, 17 67:14</p> <p>assist 13:12</p> <p>assistance 88:2,5, 6,11,16</p> <p>assisted 29:24</p> <p>associate's 7:14</p> <p>assume 18:19</p> <p>assure 102:4</p> <p>at 5:6 8:9 10:8,11, 16 11:10 12:5 14:25 15:5,21 17:14 22:6,7,8,13 23:2 24:1 25:3 26:4 27:20,23 28:12 30:19 35:5,20 36:5 38:3 40:12 43:4 44:11,18 45:2,3 46:10,12 53:15 54:1 60:9 62:12,20 63:4,7,8,15 65:5,13 67:2 69:21,22 76:16 81:1 82:11 85:13,14 94:10 96:18,19 97:6 98:17 103:11,25</p>	<p>106:9 107:1,7 117:6 120:6,8,11, 14,22 125:9 127:24 131:8 132:6 134:21 137:2 138:15 144:14,15 145:5,6 147:25 148:4,14,17 149:7 151:23 152:11 154:20 156:7,19,25 158:9, 22 159:5</p> <p>ate 63:2</p> <p>atmosphere 7:21</p> <p>attached 94:22</p> <p>attend 22:6</p> <p>attended 7:13</p> <p>attention 25:15 72:22 73:20 74:10 77:22 78:2,3 115:8 118:10 157:5,7</p> <p>August 8:18 138:25</p> <p>authority 81:2</p> <p>authorized 87:4</p> <p>auto 14:22 15:9</p> <p>automatically 66:1, 3</p> <p>automobiles 14:22</p> <p>avail 139:1</p> <p>available 82:10 83:11</p> <p>average 23:18 30:10</p> <p>aviation 15:14</p> <p>aware 72:3 118:9 145:9</p>	<p>B</p> <p>B-6 75:21</p> <p>B-U-L-L-O-C-K 6:11</p> <p>B.6. 76:14 79:5</p> <p>B.7 100:4,6</p> <p>B.7. 100:6</p> <p>B.9 79:16</p> <p>B.9. 79:8,9</p> <p>ba- 128:1</p> <p>back 7:8 11:22 12:12,17 16:11 21:23 25:7 29:22 32:20,24 35:23 37:14 40:8 54:8 75:19 104:5 112:7 128:13 129:11 143:19 144:23</p> <p>background 22:14, 15,16,17 34:18</p> <p>badge 124:2,5</p> <p>bailiffs 26:6 63:17</p> <p>balancing 81:4</p> <p>barbecue 64:21</p> <p>based 32:15,16 38:19 52:18 114:10,15 120:17 128:1</p> <p>basic 22:7 83:5</p> <p>basically 7:18 9:6 10:15 11:2,4 13:5, 13 14:20,23 15:23 16:18,25 17:2 18:11 19:4,24 23:18 24:16 25:14, 17 26:1,8,16 27:16</p>
---	--	--	--

33:17 35:18 36:6 40:20 42:14 48:24 58:18 74:4,13 84:19 86:18 87:19 103:5,22 121:7 124:6 146:16 151:13 basis 14:22 34:1 72:12 bathroom 128:19 baton 82:21 batons 82:4,7,9,23 be 4:22 5:8 9:10 12:14,16 18:13,20 19:12 21:19 22:14 23:15 24:12 25:12, 20,23 26:20,21,22, 23 29:13,14 31:3 32:2,9 33:15 34:5, 21 37:8 38:4 39:20 42:16,17 43:25 45:23 46:14 47:11, 15 50:9 53:8,11,13, 17,18,19,20 54:5 55:1 57:9 58:7 67:12,14,21,24 70:15 74:4 76:11 79:22 82:11,19 84:8,16,19 85:8,11 86:9,10,11,12,17 87:13,22,25 88:5,7, 16 89:6 90:3,5,25 91:9 93:5,6 94:2,5, 8,9,16,17,21,23 95:2,14,16 97:6 98:19 99:20 102:5, 7,11,15,17,18,20 103:1,4,7,10,11,12, 20,24 108:1,3,4,9, 12,21 109:4,13,23 110:16,17,19,25 111:5,7,16,17,18, 19,20,21,25 112:4	114:18 115:13,16, 20,23,24 116:6,18, 23 117:6,18,21,23, 25 118:1,25 120:1, 4 122:22 123:11 125:1,10,12 134:19 135:21 137:3 138:5,14 143:21 145:4 146:14 148:2 149:14 151:12 154:4 157:10 became 40:14,17 43:12 44:23 145:9 because 12:2 15:23 17:8 29:9 30:11 34:8 39:10 40:13 44:11 48:12 49:12 50:13 51:24 61:2 85:11 105:23 116:12 119:6,7 120:16 132:20 139:6 141:19 142:2 151:23 152:23 become 83:14 been 4:3 5:13 16:8, 19 23:16 25:5,22 29:3 31:7 36:12,14, 19 39:2 45:4 46:16 48:9 71:24 77:8,9 80:2 81:22 82:3 84:20,24 85:13,14 101:10,12,14 117:15 123:5 141:19 142:3 144:6,14 148:6 151:25 152:8 154:13 before 4:24 5:14,17 18:8 30:19 31:7 33:2 38:14 40:13 44:13 46:17 61:25 71:22 76:6 81:18, 23 95:5 108:10	112:15 132:10 150:14 began 7:10 42:4 156:4 begged 138:16 139:1 begin 16:19 34:19 103:13 beginning 103:16 begins 109:6 behalf 4:11 50:11, 13 behave 33:23 behavior 53:23 99:9 116:12 121:8 122:9 behaviors 118:21 156:7 being 17:2 20:18 23:16,18 72:19 93:12 120:3 123:18 157:20,23 believe 7:11 8:15, 19 9:1 10:19,20 11:9 16:7 17:21 18:4 19:13,17 20:12 25:2 27:8,10, 13 28:6 30:25 37:12 40:16 41:5, 23 43:16 51:19 55:8 59:7,23 71:10 75:13 80:7,10,17 90:12 93:15 107:11 113:13 123:1,3 127:5,11 132:15 138:5 140:16 141:4,8,20,21 142:1,8,13 145:14, 15 148:13 149:2, 13,18,20 150:8,24	151:2,11,12 153:19 157:8,24 158:2,5 belong 127:9 below 92:9 best 12:16 28:14 87:7,21,22 110:4 151:21 between 38:9 78:21 115:17 124:16 140:14 156:17 beyond 128:2 bi-monthly 97:7 birth 6:7 birthday 103:4 bit 11:17 12:15 13:1 20:6 22:20 43:19 105:2 151:25 black 48:12 156:17 BLET 19:2 21:25 35:21 36:3 83:7 133:17 Bloods 21:4,7 Blue 14:2 board 17:23 93:3,8, 18 94:4,9,11,23 95:4,18,20,24 96:2, 4,23 97:1,3,7,8,11 98:18 99:5,7 bodily 85:21,23 86:4 body 15:9 89:22 bond 65:10,12 bonded 65:25 born 12:6 both 121:23 139:12
--	--	--	---

<p>bottom 76:16,17 107:1 149:7</p> <p>boxes 45:19</p> <p>branch 7:1</p> <p>break 50:10,18 51:2,4 55:18,20 66:11,13 67:3 99:22,25 127:12,18 128:8,10,19,21,23, 25 129:1 158:19,21</p> <p>break-ins 25:16</p> <p>breaking 25:21</p> <p>breaks 5:5 35:7</p> <p>breast 129:17</p> <p>breasts 129:25</p> <p>Breedlove 17:17</p> <p>brief 90:3 132:25</p> <p>briefly 33:17</p> <p>bring 24:3 81:11 87:7,22</p> <p>broken 62:7</p> <p>brotherly 35:1</p> <p>brought 24:6 115:8</p> <p>building 38:7,8 63:7</p> <p>buildings 38:7,9</p> <p>built 12:8 65:21</p> <p>Bul- 127:9</p> <p>bullet 91:18 92:23 93:22 94:12,14 98:21 99:18</p> <p>bulletproof 110:5, 9,11,14 138:17</p> <p>bullets 97:2</p>	<p>Bullock 4:13 6:10 67:24 68:4,6,17 97:21 98:1 99:17 127:10 131:21 132:17,23 138:20 139:4,8 147:25</p> <p>Bullock's 130:19</p> <p>burglary 138:21</p> <p>businesses 25:15 43:1</p> <p>but 9:2 10:20 12:7, 8,9 13:19 19:12 20:6,11 21:12,21 23:15 24:4,17,21 25:6 26:21,24 28:5 34:14 35:11 36:13, 14,17,18 37:25 38:14 40:2,16 42:12 43:17 46:2 47:6,23 48:17 50:6, 10 53:12 57:24 60:2,3 64:16 65:23 66:14,19 69:18 70:3 71:22 72:12 75:15 78:19 80:14, 23 85:13 86:16,18 93:6,10,14 94:17 96:22 101:13 103:11,12,22 105:8,10 110:4 111:7,17 112:8,13 116:11 120:19 123:2,6,11,19 127:23 129:8,20 130:17 131:19 132:1,7 141:2,4,19, 23 142:1 145:7,9, 18 149:5,19,21,23 150:23 151:21 152:3,18 154:2,8, 12 157:1</p> <p>by 4:5 5:7 11:25 23:7 29:2 31:1,11</p>	<p>39:24 43:25 45:6, 15,21 46:6 50:25 52:12 53:9 55:21 56:11,22 58:10 59:20 60:22 64:1 67:4,22,24 68:11 70:1,17 71:15 76:1, 6 77:14 79:7 81:2 83:4 84:8,16 85:8,9 86:6 88:20 89:13 90:10 91:5,16 92:12 94:11,20,24 95:2,9 96:4 97:1,3, 7 98:3,16 100:1,8, 20 101:19 106:13 107:21 108:19 110:10 112:20 114:4,17 115:18,21 116:20 117:25 119:12 121:14 129:13 130:25 133:11,22 134:9 136:1,15 137:15 140:5,13,17,20 141:18 142:11,18, 22 143:5,12,17 144:6,13,14,15 145:24 146:2,9 147:10 148:24 150:9 151:24 153:15 155:3,17 156:5</p> <hr/> <p>C</p> <hr/> <p>C&I 14:18</p> <p>c- 32:22</p> <p>calculate 127:20,21 128:3 155:10</p> <p>calculated 38:16, 20</p> <p>call 4:20 9:3 21:2 25:11,20,21 29:25</p>	<p>30:21 31:1 32:20, 24 41:3 45:5 46:13 57:12 88:22 134:21</p> <p>called 14:17 15:6, 11,13 20:15 21:8 50:10 56:25 58:17 104:24</p> <p>calling 88:22</p> <p>calls 78:13,14 109:22 138:21</p> <p>came 7:8 16:11 18:16 23:1 36:6 44:17 48:25 69:4 103:18 135:4,5,6 148:16 150:14 151:23 157:8,14,15</p> <p>campaigning 16:20</p> <p>Campbell 126:10 142:12,22 143:5 144:8,18 146:23 147:3 151:15</p> <p>can 4:6,8 6:4,9 7:21 37:24 39:3 47:23 48:6 49:5 51:6,12, 16 52:2 53:5 55:17 57:2,4,19 58:2,15 59:9,12 60:15,19 64:2 66:19 67:9,19 68:12 69:23 70:2,3, 17 71:6,18 72:14, 25 73:15,22 74:12, 16,24 75:2,8 76:9, 15 77:2,5 78:3,17 79:14,24 80:25 81:6,25 82:15,22 83:13 84:3,5,17 85:17,20 86:24 87:2 88:4,19 89:3, 14,19 91:11,18 92:23 93:6 94:14 95:6 97:1 98:21 99:22 100:2,12</p>
---	---	--	--

101:8 102:15,20 103:4,10 105:22 106:20 107:6,12 109:14 110:7 111:9,17,19 112:24 113:9,15 114:7 116:16 117:3,12 118:1,14,23 119:2 120:22,25 125:16, 18 126:5 127:12 128:2 129:7 131:4 133:4,12,23 134:15 136:6,16 137:12 138:12,23 142:21 143:13,15 145:20, 25 146:10,18 149:3 155:4,12,18 156:1 158:18 can't 30:11 96:20 101:13 119:6,7,10 125:14 141:23 142:1 147:5 149:5 Cannons 70:18 cannot 47:25 51:9 60:17 61:8 109:12 111:16 119:3,5,7 Cappy 67:25 capsicum 84:10 captain 13:5 14:16 15:18 19:6 20:17 24:11,19 25:3 26:19,21,23 27:5, 19,20 28:21,23 30:5,23 32:3 67:24 68:1,2,4,5,16 93:6, 13 97:11,20,21,22 99:16 130:19 138:20 139:4,8 143:17 144:18,20 151:14 158:6 captain's 97:25	captains 19:17 25:5 28:16 32:2 car 54:4 139:10 career 7:11,23 19:3 careful 81:4 Carolina 6:11,14 8:21 9:22 14:13 15:12 81:16 carried 84:8 147:1 carry 78:25 carrying 84:19 case 49:21 50:17 57:9 90:7 Caswell 11:15 categories 27:5 Caucasian 54:17 caught 36:11 cause 49:8,10 79:22 85:25 caused 77:21 causes 86:2 centers 15:10 certain 10:20 17:3 29:6 32:16 39:21 59:8 67:6 138:6 certification 35:25 82:18 83:16,19 certified 18:24 19:1 22:3,23 28:15 35:20,22 39:2 82:13,16,20 83:4, 15 chain 44:5,11,19 97:8 108:25 111:15,23 118:2 122:24 139:2	chairman 99:5 chairperson 31:23 97:14 challenge 46:7 challenges 46:4 chance 70:8 76:3 change 20:13 52:18 121:8 122:9 153:1 changing 125:3 141:10 character 23:10,13, 14 characterization 116:10 charge 30:24 31:25 63:16 136:10 charged 90:7 Charges 106:22 107:25 chart 38:11 check 45:19 checking 31:20 chemical 84:5,7,20 chicken 64:19 chief 19:7 26:24 28:16 30:6 73:5 139:4 147:25 children 26:14 choose 123:20 chose 48:21 72:16 Chris 4:23 66:10 Christmas 35:10 62:22 63:9 64:12	circumstances 114:14 115:25 citizen 105:8 citizen's 68:18 108:14 109:25 citizens 25:17 43:1 108:15 civil 25:11,25 26:1, 2 27:7 136:23 137:7,18 147:14 civilian 126:17,18, 19,25 civilian's 126:22 civilians 15:7 19:17,18 clarification 97:9 clarify 39:10 44:20 135:8 clarity 44:20 45:11 clause 87:11,15,16 clearly 116:11 client 5:3,5 clients 113:24 clips 14:23 clique 73:10 close 19:13 20:18 127:24 141:3 145:6 148:16 155:7 closed 98:16 closed-type 98:14 closer 57:21 co- 69:16 code 17:1 75:8,16 codes 17:3
---	--	---	---

cold 117:3	communicate 56:4	152:6,13,17 153:3, 8,13,16,17 154:8, 15,16 157:8,15,25	con- 140:15
colleagues 113:25	communicated 112:5		concerning 40:4 106:7 118:10 147:23 148:12 149:22
collect 53:25 54:4	communication 15:10	complaints 13:16 67:8 69:15 102:5, 18 104:7,14,17,21, 23 105:8,9 106:5, 22 107:16,24 108:8,11,12,21,23 109:15 111:2 114:4 116:5 117:21 118:8,9 134:25 135:18 137:1,13 139:15,16 145:12, 13 148:9 149:13 154:10,11	concluded 53:18 147:15 159:5
college 7:12,14 22:7,8 85:12	communications 14:17 15:25	complete 55:25 56:16 58:21 59:1,6, 21 89:20 108:15, 17,19	conclusion 53:16 147:25
collision 34:10	community 7:13 22:7,22 23:8 66:5 73:8 85:12 113:25	completed 19:2 34:20 44:3 56:12 60:1 85:3 90:4,5 91:8 94:10 105:20 133:18	condition 86:1 114:12
color 114:11,16	commuted 112:4	completeness 91:23 92:16,21	conduct 23:21 53:7 68:17 92:11 104:19 113:19 114:10 118:17,20,22,24,25 119:22 125:22,24, 25 126:2
com- 69:10	company 77:14 101:1	completing 92:21	conducted 51:7 52:25 53:8 131:19 147:12 150:24 152:4
coma 85:25	complain 108:16, 17 109:22 126:19	complex 15:7	confer 39:24 40:1
come 11:22 12:12, 17 27:17 35:23 46:13,18 75:19 85:4,6 106:8 107:19,20 108:16 118:10 128:12,13 157:5,7	complained 126:21 127:1	compliance 74:25 75:3	conformance 81:14
comes 16:23 27:16 46:17 67:11,15 68:15 109:22	complaining 108:24 109:10 137:7 156:16	Complies 57:6 60:21 69:25 71:5 73:25 87:1 94:13 101:7 116:15 118:13 133:9 134:8 135:19 137:14 142:17 145:22 154:24 156:2	consecutive 99:4
comfortable 51:2 66:20	complains 90:6	computer 72:13	consider 23:19 31:6 60:4 98:18 102:14 105:13 110:3,4,8,20 116:1, 4 118:3,17 124:8,9
coming 43:17 154:7	complaint 67:9,11, 13,15,23 68:14,18, 19 69:4,7 94:19 102:14,15,20,22 103:1,4 104:16,20 105:11,13,14,17 107:17,22 108:5, 13,14 109:3,5,7,9, 19 110:6,9,16,21 111:1,4,6,17 112:2 116:17,18,19,21, 23,24 117:13,14, 16,18 118:3,18 131:6 135:5,11,14 138:1 140:17,25 144:6,14 145:8 148:12,18 149:1,4, 11,17,22 150:2,5, 12,15,22 151:12,23		consideration 102:2
command 47:19 96:1 97:8 108:25 111:23 118:2 122:24 138:18 139:2			considered 26:22 110:25 111:5,12 123:9 138:1
comment 115:14 126:8,13			considering 88:12
comments 114:15 126:14 141:15,16 156:13,23			consist 24:24 53:2
commercial 9:11			consisted 25:1
commission 133:16 136:11			
commit 121:20			

<p>Constitution 73:6 81:15</p> <p>construed 118:25 123:11</p> <p>contact 30:24 37:22 55:10 114:2 153:12</p> <p>contacted 143:17</p> <p>contained 150:12</p> <p>context 110:1 117:11,17</p> <p>continue 64:14 68:12 81:6 123:16 138:23</p> <p>contracted 85:9</p> <p>control 21:13 81:11 87:8,23 89:25 90:2</p> <p>convene 30:17 93:19 131:12</p> <p>convened 95:4 131:13,17</p> <p>conversation 4:15 5:1 131:23 132:22</p> <p>conversational 4:14</p> <p>cookout 35:10</p> <p>cookouts 62:19,21, 24 63:7</p> <p>coordinate 27:20</p> <p>coordination 97:16</p> <p>copied 134:23,24</p> <p>copies 72:9,11,18 106:3</p> <p>copy 80:7 93:2 94:21 104:6 148:1 149:6</p>	<p>corner 107:8</p> <p>Corp 7:3</p> <p>correct 43:7 44:12 56:1 65:10 79:1 86:22 110:1 111:11 117:9 120:20 130:8 144:22 145:16 148:18</p> <p>correctly 44:25 80:11 93:16 95:23 135:16 145:17 151:14 157:2,16</p> <p>could 13:13,19 24:4 29:8,12 35:21 39:14 46:7,10,11 47:11 49:12 61:7 67:14 68:7 85:11 86:10,12 87:13,25 91:19 94:9 103:11, 13 108:4 110:16 115:5,20,24 116:6, 18 117:18 118:25 120:18 121:18 122:15,22 123:11, 24 124:11,13 125:12 130:20 147:17 151:21</p> <p>couldn't 23:16 32:17 46:17 54:23 72:20</p> <p>counseled 123:5, 18</p> <p>counseling 121:3, 11,15,16,21,24 122:3,6,11,17,19, 21,25 123:8,10,14, 16</p> <p>counted 61:13</p> <p>counties 11:15 12:2,3 13:6 14:10, 12</p>	<p>county 6:21 7:8 8:5 9:2,21 10:12,14 11:1,14,25 12:5,7, 20 16:11,13 17:6,8, 9,10 19:9 20:1,20 21:25 24:1 25:9,14 26:9 35:5 36:5 37:20 38:6,12 39:24 40:1,3,12,23 42:19 50:11 62:23, 24 63:12,13 64:5 65:5 72:19 76:11, 18 77:20 79:16 80:19 81:9 84:9 85:5,9 96:14 100:14 101:25 106:23 113:4,17 114:21</p> <p>couple 9:11 15:17 21:4 59:3 72:23 141:19 142:3</p> <p>course 19:2,3 22:8, 13,23 28:5 37:18 67:18 125:5</p> <p>court 25:11 26:3,4 57:15 68:5,7 85:22 91:19 97:24 98:2 100:19 121:12 129:2 130:9 133:6 134:3,7 135:20,24 140:9,12,19 143:8 155:14</p> <p>courthouse 26:5</p> <p>courts 43:3</p> <p>created 37:10</p> <p>creates 85:24 114:13</p> <p>credit 133:17</p> <p>creed 114:11</p> <p>criminal 7:16 22:20</p>	<p>Crips 21:4,7</p> <p>cross-trained 29:6, 9</p> <p>culture 35:4,6,11 62:17</p> <p>cursory 34:14</p> <p>cussed 47:18</p> <p>custody 81:14</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D.7 100:3,14</p> <p>date 6:7 56:13,14 71:6,25 77:6,10 79:25 90:12 101:8 107:7 113:9 132:7 133:23 136:16 138:7 143:13 146:10 149:3,5,7 154:19 155:4,6,18</p> <p>dated 134:13 137:4 145:2 149:23 152:14</p> <p>day 16:7,8,9 29:13, 14 41:18,19,20 54:22 59:3 86:11 139:11</p> <p>day-to-day 14:22, 24</p> <p>days 36:25 41:17 59:3,8,24 103:3</p> <p>de-escalate 87:7</p> <p>deal 65:15 124:14</p> <p>dealt 21:17</p> <p>Dear 134:16</p> <p>death 85:24</p> <p>December 18:5</p>
---	---	--	---

decent 74:4	117:19 118:5 124:13	25 147:25 151:15	23:20,22,23 24:21, 22 25:8 27:14 28:1, 25 29:6,17,19 30:9 31:9,17,18 33:1,10 34:1,7,8 35:16 39:6,8,11,13,17 40:13,19,20 41:4, 25 42:1,12,14 43:10 47:3,10 48:7, 10,13,15,23 49:9, 10 54:11,20 55:4,7, 10,12,15 60:15 61:14,17 62:15 63:6,11,21 64:14, 16,18,24 65:1,2,17 69:3,10 70:23,24 71:8,19 72:5,9,12 75:15 76:23,24,25 77:12,15,24 79:2, 20,22 80:4,6,18 90:14 93:18 95:19, 20 96:6,16 98:18 99:15 100:16,18, 21,22,24 103:19 104:1,7,9,13,21,23 105:4,7,25 106:5 107:4,10 113:5,7, 12 116:7 120:6,11, 14 126:5,7,19 130:12 131:12,25 132:4,10,16 134:10,11 135:7,8, 20 139:14 140:6, 14,25 141:4,5,15, 17,18,21 142:1,9 143:7 144:17 145:12,14,15 147:12,19 148:4,8 149:10 150:4,16, 17,21,23 151:1,8, 10 152:16 153:1, 12,16 154:9,16 156:20 157:5,7,9, 19,22 158:1,3
decide 56:18 82:9	depends 47:4 52:24 53:3,21,23 68:14 82:10 103:16 106:7 108:13 111:4 112:2 122:13,15,22	deputy's 88:21 91:21 92:25 93:23 99:8	
decided 12:16 16:12 32:18	deposed 5:13	describe 116:16,17	
decision 24:21 32:11,22 33:2,10, 12 52:25	deposition 51:25 57:11 128:5,7 158:25 159:5	described 69:9 104:10 105:12	
dedicated 72:5		deserve 126:7	
deescalate 87:22		designed 45:21	
defensive 89:24 90:1	deputies 19:5,11, 15 22:3 25:20 27:21 29:5,16 41:2 55:1 60:25 65:18, 21,23 69:12 72:9, 17 78:11,25 81:2,9, 13,17 82:7,24 83:12,21 84:8,10 88:10,25 92:6 96:17 97:18 110:12,14 120:14 153:6 156:18 158:11	designee 99:6	
defined 114:12		despite 139:12	
definitely 110:19		detail 9:3,4,12	
definition 113:19		detailed 121:24 122:6,7	
Definitions 114:8		details 142:2 149:23 151:22	
degrees 7:14,15		detective 25:23 97:17	
demoted 125:15,17 129:15		detectives 25:19	
demotion 125:11, 13,21 126:7 127:4		determination 92:2,18	
department 8:3,10 16:1 20:3 25:13,25 26:1 27:12,15 28:1, 17,25 29:1,6,23 30:1 41:9 118:19 142:6	deputy 7:24 18:24, 25 19:1,7 22:11 23:11 26:24 28:15 30:6 34:9 37:7 39:18,19 40:9 47:17 54:10,24 55:10,12,15 63:14 64:7,8 67:16,19 69:17 80:7 82:15, 19 83:9,18 84:13 87:5,19 88:21 89:20 90:1,5,8 91:3,4,5,6,9,23 92:1,3,8 96:14 97:12 98:18 99:2 105:1 109:10 117:2 126:11 129:24 131:7 143:5,19 144:7,8,15 146:2,	determine 87:6,20 99:9	
departments 25:8 27:6 28:11		determined 24:12 39:23 46:3	
depend 67:11 104:16 116:24		develop 43:10	
depended 30:7 32:14 36:9 93:20 104:20		device 90:2	
depending 22:8 36:10 39:14 41:8 47:8 48:5 67:13,22 86:12 115:24		di- 118:11 130:4	
		dial 25:7	
		Diane 133:14	
		did 6:18,21 7:5,6,12 9:15,19 10:18 11:1 13:9,15,18 14:19 16:6,10,14 17:7 18:10,19 20:3,8,13 21:24 22:2,10	

didn't 10:4 15:24 21:14,18 23:15 39:7,11 46:12 47:6 48:12,14 49:4,24, 25 54:11,18,21 64:22,23 65:11 69:6 72:17 96:6,22 98:9 99:13 103:3 104:18 105:23 119:4 125:23 143:2 144:8 148:23 152:25 155:10 157:1,21 difference 78:21 90:20 102:25 156:17 different 9:9 14:11 18:18 25:8 27:20 37:9 45:22 83:24 96:18 121:4,19 125:1,2 146:21 149:13 151:4,6 difficulty 36:22 dinner 35:10 62:22 63:9 65:6 direct 93:25 118:11,15 119:13, 17 directed 75:16 77:23 directive 70:18 71:4,13 75:14,21 76:3,4,13 79:5,16 80:20,22,23 91:25 100:3,14 101:14 106:10,21 113:1 directly 27:17 93:3 106:6 108:5 118:16 119:13 132:11 135:6 138:4	director 38:21 106:4 133:15 135:15 153:19,21 disability 114:16 discharged 7:7 disciplinary 102:11 114:5 115:23 116:2 120:22 121:1 123:21 124:24 125:8 126:12 130:4 disciplined 146:24 147:4 discretion 119:21, 25 discrimination 50:17 67:8 68:21 135:1,11 136:10,21 137:1,8 138:15 141:14 147:16,24 152:25 discuss 5:4 79:12 96:25 discussed 51:15 151:20 discussing 67:5 disfigurement 85:25 dismissal 102:12 114:6 disorderly 23:17 displayed 90:1 displays 89:24 disposition 102:2 dispute 127:22 disputes 77:25 78:7,12	disseminate 80:4 distinction 124:16, 18 distinguishing 78:21 distri- 110:10 distribution 110:5, 9,11 District 57:9 division 41:11 97:14,17,19 do 4:19 5:4 7:6 13:14 15:22 16:10 17:12 18:12 22:15 23:1 25:13 27:15 31:15,16 32:10 38:16 42:15 46:17 51:1,4 52:7,10,11, 17 56:18 58:13,25 59:2,6,14,21 60:5, 8,9 61:3,9,11 62:22 63:8,19,20 64:11, 12,23 65:2,6 66:11, 23 70:13 71:21 73:11,18 75:22,24 77:13,16,17 78:12, 15 80:12 82:7,8,9, 17 83:2,16 87:11 89:2,4,5,6,14 92:13 94:7 98:4,7 99:18 102:14 105:2,13 106:14 109:2 110:3,4,8,10 115:18 116:4 117:21,25 119:12 124:1,8,16 126:7 129:16,24 131:23 132:4,22,24 134:12,25 135:10 136:2 137:22,24 139:7,14,22 140:14 141:16 142:5,11,19 144:4,9,11,17 149:10 150:17,21 154:18 155:7,11,24 156:9,11,12,15,16, 20 157:4 158:3 do- 42:4 document 42:20,24 49:6,7 55:25 56:5, 16,23 57:2,3,5 58:11,13,16,21 59:1,4,6,9,12,15 60:3,20 70:13,17, 21 75:11 76:9 77:3 78:3 85:17 89:9 90:11 91:4,6 106:18,20 107:7 108:18 109:9,11 115:10 116:14 119:25 130:7,8,13 131:1,4 133:7,12, 23 134:13,15 136:2,3,6,17 137:16,22 138:3 139:20 140:7 142:19,21,24 143:1,3 144:25 145:25 154:20 155:1,19,21 documentation 40:18,19 85:2 109:2 documented 91:10 94:18 108:3 109:4 116:19,20 120:1,4 154:21 documents 23:1 57:22,25 58:2,6 59:25 76:15 90:15 109:5 135:21 145:4 158:9 does 9:5 13:8 15:22 19:18 21:16 25:9,
---	---	---

<p>13,18 52:17 53:2, 22 66:2 73:13 74:19 75:1,5 76:16 78:9 83:9 86:7 92:13,17 95:10 105:3 108:2 109:18,20 114:19 115:6 119:12,21,24 122:11 123:4,22 124:1 125:1 144:25</p> <p>doesn't 66:17 67:17 108:5 111:18 112:14 123:8,13 154:1,3</p> <p>doing 13:11,13 16:25 42:4,5 108:24 123:15</p> <p>domestic 75:20 77:21,24 78:10,11</p> <p>don't 15:4 17:8 20:12 21:5,11 28:5 31:14 34:5 36:8 37:3 38:18,20 40:13 42:23 47:19 50:4,6 51:9 55:11 57:11 60:2,7,9,17 61:3,5,6,13,16 62:16 64:15,24 71:20,24 75:13 77:9 78:1,22,24 80:14,23 82:17 93:9,11,14,17 98:13 102:18 105:10 107:11 113:13 119:9,11 120:13,16 123:2,7, 19 125:7,8 126:14 129:8,19,20,22 131:13,16 132:1,7, 11,12,19 133:1 138:4 139:7 141:18 142:8 145:7,18 147:20 148:3</p>	<p>149:18,22 150:23 151:22 154:7,12,17 156:20 158:25</p> <p>done 18:13 19:3 37:12 43:8 44:8 45:6,7,10,15 46:16 47:6 52:24 56:3 65:4 67:22,24 85:12 104:4 105:21 115:21 121:17,18 152:5 158:19</p> <p>door 47:17</p> <p>down 4:10 13:6 20:14 43:2 44:16 45:8 60:20 72:14 105:1 118:11 121:16</p> <p>dr- 66:10</p> <p>draft 70:23,24 76:23 79:20</p> <p>drafted 71:11 77:13,14 79:22 101:3 145:5</p> <p>drafting 70:25 72:6</p> <p>drawn 151:4</p> <p>drive 54:2</p> <p>driving 9:10 34:2 40:21</p> <p>drug 25:12 26:7,9 27:7</p> <p>drunk 23:17</p> <p>dual 7:20</p> <p>due 77:22</p> <p>duly 4:3</p> <p>during 6:16 11:24 19:2 24:3 48:4 53:10,11 62:10,20 68:23 71:11 90:11</p>	<p>94:16 151:5</p> <p>Durwood 142:12, 22 143:5</p> <p>duties 13:3 15:23 29:18 36:11 42:9, 11,13,17,19,21 125:3</p> <p>duty 35:9 74:7</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>e-mail 30:22 58:5</p> <p>e-mailed 80:16</p> <p>E.2 106:21</p> <p>E.2. 106:10</p> <p>E.3 113:1</p> <p>E.3. 112:8</p> <p>each 11:2 28:11,17 34:1 35:8 41:9 55:3 65:22 66:1,6,8 75:11,14 76:16,17 89:21</p> <p>eager 83:21</p> <p>earlier 12:13 38:25 51:13,15 52:15 62:20 65:8 144:1 155:1</p> <p>early 97:22</p> <p>eastern 14:13 57:9</p> <p>eat 66:5,19</p> <p>ECD 90:2</p> <p>education 22:21 23:9 39:7,8,12,13</p> <p>EEOC 135:5,11,13 148:17 149:15 150:2,12,18 152:5, 17 153:2,8,17</p>	<p>154:8,10,15 157:15</p> <p>EEOC's 150:22</p> <p>effective 54:5 77:5 101:8 107:9 113:9 127:4 132:13 134:20</p> <p>effectively 81:11</p> <p>effects 84:13</p> <p>effectuate 56:4</p> <p>effort 65:20</p> <p>egregious 47:13,15</p> <p>eight 139:2</p> <p>either 7:21 24:5 76:7 117:4 119:15 120:16</p> <p>either/or 116:6</p> <p>elbow 89:23</p> <p>elected 17:5</p> <p>election 17:18,23 55:3</p> <p>electronic 90:2</p> <p>elevated 15:24</p> <p>eligibility 134:17</p> <p>eliminate 21:12</p> <p>Elvis 64:10</p> <p>emergency 88:23 105:3 138:21</p> <p>employ 47:3 96:16 103:19 120:6,11,14</p> <p>employed 67:6</p> <p>employee 43:23 44:12,17 46:6,24 47:8 56:1 58:22,23 69:16 102:2 112:5 113:18 114:4</p>
---	---	---	---

120:2,3 123:4,8,13 126:17 129:15 153:7 employee's 122:1 employees 43:21 46:25 60:5,24 62:18,21,23 65:6 102:4,6,8,10 113:20 employment 4:18 6:17 50:16 121:5 130:2 136:11 EMS 62:25 63:7 65:13,14 end 45:2,3 111:24 123:19 ended 48:19 enforcement 7:11, 24 21:19 22:7 65:14 66:4,5 73:7 83:6 97:18 134:18 engage 26:11 113:18 enjoyed 63:10 enough 47:13 122:8 152:2 ensuing 61:24 ensure 65:20 entail 9:5 13:9 14:19 123:23 141:6 entailed 15:8 entails 9:6 entering 25:21 entire 18:21 70:9 73:23 76:4 80:19 87:15,16,17 139:17 158:14	entirety 70:11 76:7 entity 50:13 entrance 26:5 environment 68:22 113:21 114:13 equal 121:23 136:11 equipment 83:10, 11,23 105:3 124:6, 8 equivalent 118:17 essentially 71:9 establish 10:4 established 12:4 92:4 94:20,24 95:9 estimation 128:2 etcetera 94:19 ethic 75:16 Ethics 70:19 75:9 evaluated 43:5,25 45:2,4 evaluation 44:9,11 45:17 46:11 105:14,18,24 106:3 evaluations 40:21 even 20:23 25:4 69:17 108:8 109:17 154:3 event 61:21,23 65:6 events 65:1,2,3,9, 17 eventually 64:16, 17 139:5 ever 5:13,16 50:18 55:15 69:11 96:19 105:25 122:25	125:5 153:7 every 21:19 51:9 60:3 61:6 80:7,8,9 151:16 everybody 12:11 17:1,3 47:18 48:25 53:5 61:3 63:3,9 151:3,13 everything 14:21 31:6 139:17 evidence 28:1,5,6,9 ex-parte 78:15 exact 19:12 20:11 64:16,25 96:20 120:13 126:14 132:7 exactly 36:8 73:14 123:16 141:18 145:7 150:19 EXAMINATION 4:4 example 47:9,16,23 48:6,8 49:10,20 50:2 51:6 54:8 60:15,18 109:22 117:1 119:2,9 examples 50:12 60:23 61:7 119:7,8, 10 exams 18:20 excluding 90:2 Excuse 22:13 62:5 157:21 executed 53:20 executive 9:3 exercising 102:9 exhibit 56:20,21 57:8,17 58:4 59:18,	19 71:13,14 72:23 79:5,6,8 89:11,12 101:17,18 106:11 112:9,11 130:12,24 133:20,21 135:25 136:13,14 137:10, 11 143:7,9,11 146:6,8 148:21 150:1,6 155:2,13 exhibits 57:9,14 133:3 expect 75:15 110:17 115:13 expectation 88:24 91:4,6 expectations 34:12,14 expected 33:23 75:6 78:25 experience 22:24 39:2 experienced 119:8 explain 18:24 34:12 41:13 43:19 46:20 52:13,22 56:3,11 58:15 67:9 78:17 89:3 95:6 102:25 123:16 143:25 146:18 explaining 121:17 explains 147:1 explanation 60:11 explanatory 130:3 express 83:9 expressed 73:8 extreme 86:2
---	---	--	---

<p style="text-align: center;">F</p> <p>F-R-A-N-K 6:10</p> <p>facility 63:4</p> <p>fact 80:8 96:13 150:9</p> <p>factory-type 7:9</p> <p>factual 90:3</p> <p>faded 149:6</p> <p>fair 84:22 102:6 152:2</p> <p>fairly 148:16</p> <p>fall 27:5 28:8</p> <p>falls 113:19</p> <p>familiar 5:19 51:23 90:21 130:1 131:1</p> <p>family 9:8 12:11 22:21 126:20,22</p> <p>far 8:5 72:3 134:11</p> <p>fashion 103:13</p> <p>fast 105:2 120:18</p> <p>Fayetteville 12:24 13:23 14:9</p> <p>Federal 114:17</p> <p>fee 16:19</p> <p>feel 51:1 64:22 86:13,16 134:21</p> <p>feels 86:15 118:20</p> <p>felt 24:12 32:6</p> <p>female 96:14 126:8, 13</p> <p>few 36:25 61:6 98:8</p> <p>fewer 14:11</p>	<p>figure 67:19</p> <p>file 16:18 55:12 99:9 112:1</p> <p>filed 17:22 109:19 149:13,14,19 151:24 153:2,7</p> <p>filing 16:19 92:16 153:2</p> <p>fill 120:18</p> <p>fills 95:1</p> <p>find 138:20</p> <p>finding 146:13</p> <p>findings 132:2</p> <p>fine 4:22</p> <p>finished 50:20</p> <p>fire 13:18</p> <p>firearms 82:3,5,6, 22,25 83:5</p> <p>fired 50:16</p> <p>firing 13:20</p> <p>first 10:23 11:3,13, 21,22 12:19 13:5 16:8 28:13 35:19 41:14 65:14 71:3 77:2,18 79:24 83:25 87:2,17 88:8, 20 89:19 91:18 92:18 93:22 96:14 97:23 101:5,15,16, 23,24 107:6,12 113:15 134:18 135:3 136:19 143:15 144:4,10,11</p> <p>firsthand 119:20</p> <p>fist 89:23</p> <p>fit 23:6</p>	<p>five 9:15 93:12 99:23 128:20 129:2</p> <p>five-minute 55:18 128:21 158:19</p> <p>flies 9:10,11</p> <p>fly 9:10</p> <p>focus 150:1</p> <p>follow 27:22</p> <p>followed 92:3,22 139:2 151:19</p> <p>following 45:3 97:12</p> <p>follows 4:3</p> <p>food 63:9</p> <p>for 4:9,10,19 6:4 7:8 9:8,15 10:16 12:16 14:6,20 16:13,14,22 17:3, 20 18:17 21:25 22:3,10 23:8,11,12 24:13 25:16 26:8 31:19 33:20 34:21 35:13 36:8 43:17, 20,21 44:20 47:4 48:12 49:10,25 50:9,21 52:1 56:21 58:15,23 59:19 60:8,16,23 61:20 63:14 64:15,24 65:18 66:1,11,13, 16 70:6,25 71:14 73:19 74:12 77:19 78:15 79:6 83:22 88:17 89:1,12 91:23 92:15,16,21 97:11,16 99:23 101:18 102:1,8 105:19 106:9,11 107:14 109:21 112:11,24 114:21</p>	<p>125:21 131:5,15 132:1,3,11 133:4,8, 21 135:25 136:6,14 137:11 138:12,17 139:1,9,19,20 143:11 146:8,17,24 155:1,18 156:12 158:23,24 159:1</p> <p>force 61:24,25 79:16 81:3,10,13, 18,20,23,25 87:4,9, 13 88:14 89:15,16 90:9,11,12,17,24 91:22 92:6,19 93:3, 7,18,21 94:4,8,10, 23 95:1,4,10 96:23 97:7 98:4,14,23 99:5,20 130:11 131:9,10,15 152:3 155:9,12,15,23</p> <p>Force/assault 89:21 90:4 92:5,9 93:1,4 94:17,22 97:5,10 99:3</p> <p>form 43:11 45:5,21 57:1 58:17 59:22 90:10 91:8 94:10, 18,21 102:7 105:24 108:14,17,20 118:18 121:9,25 122:6,8 123:5,9,14 135:4 153:14</p> <p>formal 116:17,18, 23 117:12</p> <p>former 59:18 63:13 139:4</p> <p>forms 91:4 93:21 95:5</p> <p>forward 44:4,5,6 111:11</p> <p>forwarded 94:23</p>
--	--	--	---

104:3 106:3 109:13 111:14,18,20,21 135:15 148:25 forwarding 107:15 found 12:15 four 15:6 25:2 30:16 41:5 93:12 96:20,21 Frank 6:10 Franklin 12:2 free 23:4 112:13 113:21 134:21 from 6:24 8:5 10:11 16:5 20:9 22:18 29:9,10 35:23 41:19,23 43:3 55:15 58:6 67:20 74:16 76:11 85:5,6 95:21,23 97:12 98:23 99:7 100:14 102:8 107:25 108:23 113:22,24 121:2,3 122:23 123:22,24,25 133:13 135:4 137:4 138:25 143:5,19 148:19 150:18 151:12 front 47:17 48:24 134:13 136:3 137:16 fuel 14:23 full 57:5 function 26:10 86:4 funnel 27:18 further 158:25	G gang 20:16,22 gang-related 21:20 gangs 20:20,24,25 21:2,3,13 garages 15:9 garnered 17:22 gathering 34:18 63:1 gatherings 65:3 gave 140:8,9 147:20 148:1 150:13 152:7,24 gay 158:10 geared 103:7 Geis 23:1,3,6 50:20,24 51:18,23 52:6,10 55:19 57:7, 16,18,22 58:3,8 63:25 66:12,21,25 67:2 68:10 70:5 75:23,24 99:24 100:5 112:9,12,18 127:12,16,19 128:3,6,9,15,20,24 129:4 130:14,16,19 139:25 140:3 147:5,8 148:22 153:14 155:21,24 158:20 159:3 gender 78:7 115:2, 15 137:8 general 17:19,20 33:20 34:15 87:3 generally 19:7 28:10 29:2 32:1 47:5 59:22 60:12	66:5 67:13,22,23 68:16 83:11 93:14 97:21 107:21 127:23 154:6 geography 36:22 get 4:25 16:20 21:12 24:7,20 29:6 30:9,11,12,15,16 40:5,7 47:21 49:20 50:14 57:20 63:8 83:13 95:21 98:9 103:3 104:12 112:17 121:19 122:8 124:14 127:24 gets 82:9 getting 108:10 give 6:1 21:14 38:22 39:16 47:9, 23 48:6,7 50:2 57:2 58:4 60:15,23 74:19,22,24 75:2 80:6 119:2,9 134:21 given 45:23 104:5,6 125:20 135:14 138:18 150:10 go 6:18,21 7:12 8:8, 20 9:12,19 21:23 22:18 23:4,6 25:20 28:9 29:12 30:3,16 31:4 33:20 35:21 40:2,8 44:17 45:8 50:19 54:3,8 58:2 66:9,10 67:20 69:22 71:3 76:5 77:2 79:24 94:12 95:3 101:5 105:7, 16 106:6 107:6 108:5,8,23,25 111:23 116:13 118:11 128:2,11,16	129:7,11 133:3 138:8 139:6 goes 56:7,9,12 121:25 149:20 going 27:21 29:22 33:19 38:4 44:13 72:23 73:23 104:12 105:3 112:7 123:17 127:20,22,24 128:9,21 129:7 133:3 139:7 141:3 142:3 gone 99:16 152:10, 11 good 4:6,8,9 23:13, 14,19 54:14 63:1 got 7:14 12:14 18:9,15 20:14 25:10 35:6 36:7 37:22 39:1 48:19 58:3,8 63:2 137:3 139:11 government 9:4 governor 9:7 graduated 6:25 grant 133:16 granting 35:24 Granville 8:5 great 35:6 grew 12:7 grievance 55:12 101:21 102:6,9,23 103:6,7,10,17,20, 23,24 104:6,9,10 grievances 102:2,5 103:15 104:1,15 106:5 116:5
---	--	--	---

<p>ground 27:23</p> <p>group 21:8 77:14, 16</p> <p>groups 114:1</p> <p>grow 20:3</p> <p>grown 20:6</p> <p>guaranteed 113:21</p> <p>guess 12:9 29:8 86:19</p> <p>guidelines 87:3 107:14</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>ha- 117:8</p> <p>habits 34:2</p> <p>had 5:1 12:4 21:4 22:19,20 28:5 29:1, 16,18 30:7,8 31:7 32:17 35:9 36:21, 22 37:25 38:10,21, 23 39:18 42:5 45:22,23 46:16 49:9 62:17 63:9,14 65:24 68:23 69:8, 11,14,19 70:8 75:11 76:3 95:5 96:19 98:20 100:9 104:2 106:2,17 112:21 120:17 125:19 126:12 132:23 144:6,14 153:4</p> <p>hand 98:17,20</p> <p>hand-delivered 80:17</p> <p>handed 43:2 138:3, 4 148:7</p>	<p>handicapping 114:12</p> <p>handing 83:22</p> <p>handle 13:15</p> <p>handled 67:7 105:11</p> <p>handler 26:16 124:10,12,14</p> <p>handling 105:16</p> <p>hands 32:17 42:6 82:2</p> <p>happen 31:2 34:16 43:23 44:2,7 53:14</p> <p>happened 11:19 12:22 13:25 14:14 15:19 17:25 40:25 47:13 115:6,10 144:3 157:1,3</p> <p>happens 9:7 111:2 123:13</p> <p>happy 46:14 105:22</p> <p>harassed 120:3</p> <p>harasser 121:2</p> <p>harassing 69:16,17 113:24 118:16,22, 24 119:1</p> <p>harassment 67:8 68:21 102:8 103:8 113:2,20,22 114:8, 9 117:8,11,17 135:1,3 136:20 137:1 141:13</p> <p>harm 115:21</p> <p>has 5:8 19:1 38:12 56:13 59:7 77:8 80:2 81:22 82:12 90:6 101:10,12,14</p>	<p>109:4,16,24 111:6 115:9 117:14 118:10 153:7</p> <p>have 5:13,16 6:13 7:12 9:12 13:18 16:8 18:12,19 19:3, 4,5 20:6 21:20 23:15,16 25:5,9,22 28:1 29:1,3,19 31:9 32:11,18 35:17 36:12,14,18,22,23 40:2 41:4,9 42:1,16 45:4 46:25 48:1,9 49:10,11,18 50:10 52:7,10 55:1 56:20 57:11,23 59:10 61:1 69:3,10 70:3 71:24 72:5,13 73:23 75:13,22,25 79:10 80:10,12,13, 14,16 81:17 82:3,7, 10 83:13,14,18 84:20,24 85:3,13 95:24 96:7 99:13, 15,16 105:3 106:5, 12,17 108:5,14 112:14,21 114:1 117:1 118:7 119:21,24 121:17, 18 122:25 123:3,4, 5,7,19 124:1,16,25 125:5,8 127:6 129:3,4,6 130:22 132:12 134:12,20 136:2 137:16 141:2 142:6,15 144:3 145:19 146:14 148:6,10 152:5,8, 10,11,12 153:19 154:3,20 156:23 157:1 158:8,25</p> <p>haven't 5:25 61:13 119:8 130:16</p>	<p>having 4:3,15 105:10</p> <p>he 9:10,11 17:15, 16,19,22 24:11 26:21,22,23 27:22 36:21 47:18 48:12, 13,15,16,17,18 49:24 54:11,13,15, 16,21,23,24,25 55:6 57:18 61:21 63:15,16,18,19,24 64:3,9,10,11 74:24 75:2 82:16 84:1 89:21 97:21 105:2, 3 112:14 126:4,5,7, 8 131:21,25 132:1, 6 134:11 137:6 139:10 145:8,9 146:21,25 147:5 149:13,14,24 150:9,11 151:4,5,6, 24 152:23 153:2,7 154:11 156:19,25 157:3,5 158:5</p> <p>he's 9:7 52:6 149:19</p> <p>head 118:20</p> <p>hear 4:6,8 17:5 55:15 119:4,15,19 125:23 157:21</p> <p>heard 47:18,19 156:22 157:19,22</p> <p>hearing 119:18</p> <p>held 13:11</p> <p>helicopters 15:15</p> <p>Help 98:16</p> <p>helped 65:9,12</p> <p>helping 26:14</p> <p>Henderson 12:3</p>
--	---	---	---

her 19:2 37:1 46:16 52:1	46:16 54:13,14 55:8 63:19 84:3 89:22 94:11 99:5 105:3 108:24 120:8 131:22 132:2,5,8 135:7,11 139:9 145:8,12 147:1 148:15 149:24 150:24 151:5,13,17 154:22 157:8,13, 15,25	house 12:8	hypothetical 47:22
here 8:5 9:21 10:11,16 11:20,21, 22,24,25 12:8,10, 16,17 16:11 39:1 50:10 57:24 58:4 68:9 122:5 128:10, 16 129:9 146:22 148:22 150:11 152:13	Hispanic 21:10	how 7:4 8:6,11,14, 25 9:13 10:7,18,22 11:7,16 12:18,20, 25 13:21 14:4 15:3, 4,16 16:3 18:6,7,8, 10 19:9 22:2 25:8 28:16,24 30:7,9 31:15 32:6,15 33:21,23 36:9,10 38:16,20 40:22 41:4,6 42:16,17 48:23 50:14,15 52:22 53:20 54:18 58:25 59:5,21 61:9, 14 67:7,11 68:25 69:4,10 71:8 72:1 78:1 82:9,10 83:9 86:13,14,16 87:15 93:18 95:10,11,12, 20 96:16 98:4,13 99:19 104:1,7,13 105:2,6,7,16 107:17 108:11,21 117:19 120:6,11, 14,17 121:18,19 122:6,11 130:12 132:22 133:1 140:6 144:4,11 147:3,19 155:7 156:20 157:7	<hr/> I <hr/>
here's 38:2	hold 62:21 75:18 127:22 129:8	41:4,6 42:16,17 48:23 50:14,15 52:22 53:20 54:18 58:25 59:5,21 61:9, 14 67:7,11 68:25 69:4,10 71:8 72:1 78:1 82:9,10 83:9 86:13,14,16 87:15 93:18 95:10,11,12, 20 96:16 98:4,13 99:19 104:1,7,13 105:2,6,7,16 107:17 108:11,21 117:19 120:6,11, 14,17 121:18,19 122:6,11 130:12 132:22 133:1 140:6 144:4,11 147:3,19 155:7 156:20 157:7	I'D 146:14
high 6:19,20,21,23, 25 77:21	holding 97:12	117:19 120:6,11, 14,17 121:18,19 122:6,11 130:12 132:22 133:1 140:6 144:4,11 147:3,19 155:7 156:20 157:7	I'LL 58:4 67:2 130:21
highest 96:19	home 7:8 12:12 16:12 54:3 63:4		I'M 4:13 10:19 12:21 15:17 18:8 24:16,19 25:10 29:4 37:4,6,9,20,21 41:12 45:11 48:3 49:9,10,19 50:14 53:12 57:12,15 59:8,24 67:25 72:3, 23 73:23 78:19 79:13 80:22 85:22 87:15 90:21 93:20 101:2 103:2,3 104:25 105:6 119:4 121:12 123:1 125:23 126:11 127:19,22 129:7 133:6 135:6,12 136:25 138:6 139:22 141:1,20,25 142:8 148:1 149:6, 15 152:7,12 155:1 157:10 158:19
highway 6:16 8:21 9:23 14:21,24 15:8 65:14	home-type 7:21		I'VE 37:22 38:25 58:3,8 96:19 104:2 137:3
him 9:9,10,12 17:23 36:25 37:1 48:21 49:4,16,24 50:1 52:4,8 54:19 55:4 57:3 58:4 112:15, 16 132:8,11 133:17 138:20 140:8,9 141:2,10 147:21, 22,24 148:1,8,11 149:22 150:13 151:24 152:24	homegrown 21:1		I-85 67:17 105:1
hire 13:18 31:8 33:4,5,10,19 34:21 35:14,18 37:23 138:16	homes 25:16 43:1 66:7		i.e. 138:21
hired 22:4,10,11 36:7 37:18 45:1 50:15 85:8 96:14 101:1	honorably 7:8		ID 53:25 124:5
hiring 13:19 23:25 24:2 29:24 37:15	hopefully 117:5		IDENTIFICATION 56:21 59:19 71:14 79:6 89:12 101:18 106:11 112:11 133:21 135:25 136:14 137:11
his 9:8 17:17 19:2	hospital 86:8,20		
	hospitalization 86:5,7		
	hospitalized 86:13		
	host 22:24 65:17		
	hostile 68:21 114:13		
	hot 117:3		
	hotel 63:8		
	hour 66:24 122:14 129:6		
	hours 41:22,25 42:1 129:2		
		However 78:15	
		HR 13:15 37:15,17, 18,20,22 38:2,6,15, 21,23,24 39:14,24 40:2 55:10 56:7,12 104:3,6 106:4 135:4,14 148:19,25 153:19,21	
		huh-uh 5:20	
		human 44:6 45:21 58:18 81:4 105:25 106:1,2	

<p>143:11 146:8</p> <p>identified 80:15 94:15</p> <p>identify 70:17 76:9 79:14,15 81:25 100:12 101:16 106:20 136:6,16 142:21 145:25 149:3</p> <p>if 4:19 9:10,11 17:4 18:23 22:20 23:3 25:10 30:23 32:1, 16 33:10,12,18 34:5,20 35:19,21 36:21 37:3 39:18 42:18 44:25 46:17, 24 47:5,12,17,18 50:17,18 53:1,17 54:23 59:24 60:12 61:7 64:19,20,21 67:14,15,19,20 68:15 69:4,15 71:3 73:15 75:18 76:5,6 77:18 78:16 80:11 83:11 88:25 89:2,3, 7 91:3,5,8 93:2,16 94:6 95:13,16,22 99:2,9 101:3 103:17 104:24 105:18,21,22 106:7 108:4,10,14,15,16, 17 109:8,10,12,17, 21 111:12,15,17,19 115:4,6,8 116:22, 25 117:1,24 118:5 119:19 122:3,4,9 123:8,13,20 124:4 127:20 130:17,20, 21 131:13,16 134:20 135:15 141:1,10,17,20,25 142:5,9 145:14,17 147:12,20 148:2 150:9 151:2,6,11,</p>	<p>14,17 152:12 157:2,15</p> <p>immediate 43:25 44:16 45:6,7,15 95:2 108:24 122:23</p> <p>immediately 54:6,7 132:14</p> <p>impact 39:8,12,13, 14,17</p> <p>impacted 39:5</p> <p>impaired 5:25</p> <p>impairment 86:3</p> <p>imperative 50:12</p> <p>impersonations 63:20</p> <p>implement 100:21, 24 107:4 113:7 116:7</p> <p>implemented 100:25 101:3 116:9,11 125:5</p> <p>implementing 72:6</p> <p>improper 99:9 126:2</p> <p>in 5:5 6:13,15 7:4, 10,11,15,16,17,21, 22,23,24 8:5 9:2,9, 13,21 10:5,7,14,20 11:7,14,21 12:4,6, 7,14,20,25 13:6,12, 21,23 14:2,4,5,13, 16 15:11,12,16,24, 25 17:9 18:3,5,9, 11,16 20:5,20 22:10,21,22 23:1, 11 24:3,5,6 26:9, 11,13,20,21,25 27:1,12 28:25 29:1, 6,12,13,14 30:9,10,</p>	<p>24 31:25 32:20,22 34:9,10 36:22 37:14,15,19,25 38:7,8 39:3,17 40:5 42:6,13 43:12,17 44:10,22 46:16 47:17 48:19,21,24, 25 49:4,16,20,21, 24 50:1,6 51:17,24 54:9,19,24 55:1 57:9,11 60:25 61:22 62:17 63:16 66:4 67:7,12,15,17 68:15 69:8,11,15 70:11 71:22 72:13 73:16 74:2,5,13,20 75:2 76:7 78:14 80:8 81:13,14 82:13 83:5,9,15 84:11,14,20 86:5,8, 20 87:5,8,23 89:2, 4,24 90:7 91:24 92:10 93:22 94:6,7, 16,19 95:8,15,25 96:14 97:22 98:20 99:2,3 100:5 103:12,13,17,18,25 104:9,10 105:5,11 106:1 107:19,20 108:1,16 109:22,25 110:1,13 111:9,25 112:1,12 113:18, 20,21,22 114:12,20 115:4,14 117:11, 16,19 118:2,6 119:19,23 120:2 121:7 123:9,19 125:15,16,19,20 126:15 127:7,24 129:15,17,22 130:3 131:8 132:20 133:18 134:13 135:4,13 136:3 137:2,6,16 138:19, 22 139:9,14,17</p>	<p>140:14 141:16 142:6,10 143:18,19 144:22,23 145:1,6 146:13,14,17,22 147:13,22 148:6 149:23 150:9,13 151:13,16,23 152:5,13,24 154:13 155:4,8 156:17 157:8,15,24 158:4</p> <p>in- 37:18</p> <p>inappropriate 126:9</p> <p>Inaudible 130:18</p> <p>incapable 89:8</p> <p>incident 53:4 69:19 81:11 87:7,22 92:1, 11 94:7 98:5,17 123:2 125:16 132:18,20 143:18 144:19,21 145:5</p> <p>incidents 77:21 78:11 99:3 144:3</p> <p>include 84:11</p> <p>included 15:15 19:16 26:4 89:24 125:12 132:2 135:13 142:9 147:13 152:24</p> <p>including 88:18,20 102:12 114:6</p> <p>indeed 118:20</p> <p>indicated 28:12 40:11 118:19 131:21</p> <p>indicating 123:5</p> <p>individual 10:25 32:15,20 37:23 38:22 45:8 46:14</p>
--	---	--	---

48:11 49:15 51:10 52:18 53:21 58:19 61:20 72:12 73:3 86:12,14 88:17 103:12 104:5 105:21 121:8,17 123:18 125:19 126:3 individual's 56:14 65:22 114:15 126:20 individually 33:9 individuals 24:2 25:2 49:18 56:13 61:17 83:24 141:9 inform 53:24 informal 117:16,18, 21 118:3,8,9 information 34:19 35:17 97:9 99:6 109:18 initial 92:2,8 initially 145:9 initiated 40:11,17 117:20 initiating 103:24 104:5 injure 88:25 injured 62:2,4,6 81:22 88:12 89:7 90:6 91:3,5 injuries 88:18 injury 85:21,23 86:2 90:6 91:7,9 inquire 153:13,16 inquired 153:19,23 154:2,5	inquiring 154:8 inquiry 86:2 87:24 instance 39:17 51:12,15,17 125:15,18 129:15, 16,21 156:12 instances 26:13 40:5 51:20 116:5 120:2,4 instead 94:17 instructing 52:4,8 instruction 84:12 instructor 83:5 85:6,8 instrument 82:15 instruments 82:19 inten- 95:7 intended 95:7 intentions 16:22 interact 40:22 interest 82:13 83:9 112:12 interests 81:4 internal 67:23 68:16 97:15 99:7, 12,15 108:21,23 internally 27:24 117:2 interpret 86:19 92:13 99:18,19 144:4,11 interview 24:13,25 30:8,20 31:3,24 32:7,12 151:1 interviewed 24:13 31:19 141:9 151:3	interviewees 33:1 interviewing 53:5 interviews 23:20, 21 32:12,13 53:7, 10,12 into 23:6 27:16 47:12 66:10 69:22 109:24 110:19 111:8 115:10 117:23,25 118:4,7 121:25 133:3 150:24 introduce 33:18 investigate 104:22 109:17 114:4 127:6 140:15,25 157:9 158:1 investigated 110:18 117:22 141:1,20,21,23 142:1,7,9 149:12, 16 150:9,11 157:10 investigating 105:7 investigation 22:18 25:18 27:6 42:22 47:6,7,10,12,14,20, 24 48:2,5,7,11,14 49:13,19 50:3,8 51:8,16 52:25 53:2, 15,16,17 67:18,22, 24 68:16 103:20,23 104:4,8,17,19,24 105:5 106:21 115:14 118:18 119:22 126:15 127:7 130:11 131:6,9,19 132:21 141:5,17,24 147:12 150:24 155:8,16, 24,25	investigation's 28:21,22 investigations 25:11 27:23,24 50:7 97:17 145:4 investigator 25:24 67:14 invited 62:18,22,23 65:7,13 involve 21:18 105:25 involved 32:22 37:15,17,19 53:6 61:22 77:23 92:7, 10 94:6 99:2 115:17 126:15 127:7 131:8 132:20 141:9 151:3,13,16 158:5 involvement 23:8 106:2 involves 129:17 involving 114:14 118:5 143:19 is 4:14 5:11 6:6,12 7:17 8:4 11:14 16:11 17:3,5,10 19:1,7,9 23:14 24:15 28:16 29:23 34:20 37:17 38:4, 16,19 39:23 42:5 44:3,13,14,22 45:16 48:19 50:16, 20,24 51:1,16,19 52:16,22,25 55:25 56:3,5,12,16,20,23 57:5,24 58:16,18, 19 59:12,18 60:1,3, 12 61:1 66:20 67:13 68:8 69:16, 17 70:5,18 71:13
---	---	---	---

73:3,5,9,15 74:15 75:5,11 76:13,20 79:5,18 81:4,8,10, 20 82:1,2 83:15 84:22,23 85:1,24 86:1,2,18,19,21 87:4,9,24 88:24 89:11 90:5,7,9,17 91:3,5,8,9 92:10,20 93:5,9 98:14,17 99:2,10 100:5 101:25 102:3,22 105:1 106:23 107:1,17,21 108:14 109:13 111:5,12 112:3,9 113:3,17 114:9,20 115:8 116:10,12,18,21 117:3,7,12,16 118:19,22,24 119:13,17 120:3,19 121:6,9,11,15,16, 21,24,25 122:6,10 123:9,15,17,22 124:3,4,19 125:10 126:24 128:7 129:3 130:3,23 131:4,14 133:12,20 136:2, 10,12 138:14 141:8,10,22 142:24 143:1,3,21 144:22 146:4,20 147:13,20 149:6,12,15,24 150:10 151:2,7,17, 18 152:6,12,13,24 153:7,21 154:3,5 156:3 isn't 82:16 110:4 114:23,25 115:2 128:5 issuance 84:22 issue 20:20 78:10 84:9 95:12,13,14	issued 82:11,23,24 84:24 124:6 issues 13:15 94:15 it 4:17 9:3,6,10 10:19,20 11:5,9 12:16 13:23 14:12, 18 15:4,5,13 16:7, 16,23 17:9,10,21 18:8,10 19:11,13 20:6,10,11,15 22:13,24 24:6,10, 11,17 25:1,2,3,5,7, 20 26:21 27:18,19 28:4,6 29:12 30:1, 3,13,23 32:1,2,14, 17 33:10,12,18 34:1,6 36:17 37:3,8 38:1,15,19 39:6,14 41:3,5,14 42:5,24 43:14,16,17,20 44:3,4,5,6,14,18,21 45:19,20,22 46:12, 16,17,18 47:4,6,18, 19 48:14,16,19,24, 25 49:9,21,22 50:9, 15,17 52:2,7,19,24 53:1,3,21,23 55:8 57:12,21,24 58:3,4, 8,18 59:2,8 61:24 62:25 63:22 64:15, 16,18,22,23,24 65:12,14 66:14,17 67:11,12,14,20,21 68:14,17 69:5,9 70:3,4,15 71:22,24 72:13,24 73:12,14, 15 74:2,15,19,22 75:18,25 76:5,6,7, 11,16,20 77:14 78:20,24 80:6,11, 14,17,22,24 81:8 82:10,14 84:22,24 85:6,11,13,20 86:1, 2,10,12,13,15,19	87:7,20,22,25 88:4, 24 89:14 90:24 91:3,5,9 92:1 93:1, 9,11,16,22 94:5,9 95:2,3,6,8,11,12,16 96:1,18 97:21 98:17 99:6 100:5 101:1,25 102:17 103:11,12,14,16, 18,25 104:4,16,20 105:18,21,22 106:7,12,14 107:21 108:3,4,13,14 109:4,6,11,12,13, 21,24 110:19 111:4,7,9,11,15,18, 19 112:2,16,17 113:17 114:7 115:8,10,11,20,24 116:9,11,18,22,23, 24 117:5,19 118:1 119:12 120:1,17 122:13,15,22 123:6,11,15,20,24 125:3,7,9,12 126:11,17 127:3,6, 21,22 130:20,23 132:25 133:1,25 134:16 135:12,13, 15 136:18 138:4,14 139:19,21 140:4 141:20,21 142:1,7, 9,12,22 143:21 144:6 145:8 146:14,15,25 148:2,5,6,23 149:6, 23 150:9,16 151:3, 12,18 153:20,24 154:2,3,6 155:1,2 156:4 157:2,3,4,5, 6,7,8 158:8 it's 4:15 7:20 8:5 17:8,10 18:21 25:10 29:25 34:20	38:20 44:13 45:21 48:9 50:12 53:4 56:13,25 57:12,17 58:17 59:13 61:12 66:12,14,18 67:14 68:15 77:9 78:20 86:14,16 90:10 105:18 106:7 108:14,25 109:8,10 111:7,12,19 112:13 113:1 115:4 118:5, 25 122:7,8 123:19, 25 130:21,24 133:7,13,14,15 136:5 141:19 142:3 143:4,23 145:2 146:2 147:8,9 149:6 151:11 154:13,21 items 32:16 its 27:1 44:18 70:11 73:6,8 76:7 84:11, 21 113:23 itself 101:11,12 110:13 116:24 <hr/> J <hr/> J.J. 143:5 144:7 145:7 jail 65:16 Jamel 133:15 January 143:20 144:22,23 job 7:9 8:9 14:19 42:25 jobs 7:9 22:19 139:7 Johen 134:22 135:14 153:22
--	---	--	--

<p>joined 8:21</p> <p>joint 11:5</p> <p>joke 115:6</p> <p>jokes 63:16 114:15, 22,25 115:2</p> <p>joking 117:19</p> <p>July 71:25 80:1 101:9 113:11 142:23 143:14,16 145:1,2 146:11 149:23</p> <p>June 133:25 134:13,16,20 137:4 138:6,19,25 152:14</p> <p>just 4:15,23 11:17 12:12 13:1,23 14:10 15:24 16:22 17:10 18:17,24,25 20:25 23:1,4,17 26:1 30:1,13 31:19 33:20 34:14 41:11, 13 42:10 44:20 46:15 47:17 48:4, 18 49:4,6,10,11,16, 17,19,24,25 50:14, 18 52:1 54:18,21 55:24 56:13 57:12 58:18 60:13 61:6 63:1,2,10,22 64:9, 12,22,23 65:4,12 68:7 72:19 73:22 74:2 78:24 81:6 102:1 103:1 105:12 111:6 112:8,16 116:10,22 119:8,10 122:8 125:8 126:11 127:14 136:25 139:21 141:15 148:22 150:3 154:6 158:23</p> <p>justice 7:16</p>	<p>Justin 51:25 130:11 131:7 133:15 137:4 146:3</p> <hr/> <p>K</p> <hr/> <p>K- 28:25</p> <p>K-9 25:12 26:12,15 28:25 29:2 124:8,9, 11,14,15</p> <p>K-9S 26:13 27:9</p> <p>keep 124:5,6 129:9</p> <p>kept 15:23</p> <p>kids 66:8</p> <p>kill 34:5</p> <p>kind 7:20 13:10 21:15,17 26:15,23 27:1 31:19 32:20 33:18 35:11 45:11 46:13 47:6 54:4 63:11 67:20 95:15, 17 139:21 140:9 141:3 151:3 152:7 158:8</p> <p>knee 89:23</p> <p>knew 42:11</p> <p>know 5:4,13 12:14 16:20 20:6,18 22:19,21 23:13,16 30:12 31:14,15 32:6 33:15,25 34:4 36:8,21 37:3,22 38:4,16,18,20,21, 23 40:13 46:11 49:17 50:16 51:2 54:9 55:11,14,24 57:13 58:18 60:2, 13 61:9,13,16,19 64:15,24 65:9,24 66:6,7,19 67:16,17,</p>	<p>18,20 70:7 71:20, 21,24 76:2 77:13 78:24 79:11 93:9 98:13 103:4 105:1 131:13,16 134:11 147:20 148:3 150:3 154:1,2,4,17</p> <p>knowing 139:12</p> <p>knowledge 153:9 158:12,13</p> <p>Konopka 133:14</p> <hr/> <p>L</p> <hr/> <p>L.D. 139:4</p> <p>label 57:7</p> <p>labeled 57:10</p> <p>larcenies 25:16</p> <p>large 19:9 25:21</p> <p>last 16:7,9 17:13 61:15,17 62:11,15 67:25 74:16 78:17 84:3 97:1 98:21 99:1,18 109:14 122:11 135:20</p> <p>late 66:19 138:19, 25</p> <p>later 18:16 20:14 143:22,24 157:6</p> <p>lateral 11:20 12:19 14:1</p> <p>latter 24:3</p> <p>Latwanya 131:7</p> <p>law 5:12 7:10,23 21:18 22:7 65:14 66:4,5 73:7 74:25 75:4 83:6 114:17 134:18</p>	<p>lawful 81:2</p> <p>Lawrence 147:25</p> <p>laws 73:5 75:6 81:15</p> <p>lawsuit 51:19</p> <p>layman's 73:16</p> <p>lead 74:5</p> <p>leadership 18:23 20:4 55:2 96:7,12</p> <p>learn 48:23</p> <p>learned 135:3,10, 12 136:20</p> <p>learning 40:23</p> <p>least 97:7</p> <p>leave 34:17 124:1</p> <p>leaves 58:23</p> <p>Lee 142:22</p> <p>left 67:5 128:14 129:6</p> <p>legally 73:8</p> <p>lemonade 64:22</p> <p>less 61:12 87:6,20, 21 98:11 121:21</p> <p>let 32:6 34:4 37:14, 22 38:3,21,23 46:11 55:17 56:19 57:20 59:17 70:7 71:12 76:2 79:4,11 133:19 135:8 139:19 141:7</p> <p>let's 6:24 12:6 18:22 21:23 25:7 39:10 40:8 46:19 47:21 54:8 57:2 66:22,23 67:6 75:20 79:3,8 86:24,</p>
--	--	---	--

<p>25 88:1 89:9,10 91:11 94:12 101:5, 16 108:11 116:13 118:11 128:8,13,22 130:6 132:8 134:1, 5 135:8,17 137:9 142:15 143:6,9 144:10 146:6 150:1 154:22 155:11 158:18</p> <p>lethal 87:4,6,9,21</p> <p>letter 55:4,6,7 67:12 145:16,18, 19,21 146:2,10,13, 14 147:19 148:8,11 149:21</p> <p>letters 60:5 145:18 147:22</p> <p>letting 51:2 57:13 58:18</p> <p>level 22:21 39:7,12, 13 88:22</p> <p>levels 39:19 118:16</p> <p>liaison 93:4 95:3 97:15</p> <p>lieu 129:18,22</p> <p>Lieuten- 147:3</p> <p>lieutenant 12:23 13:4,5 18:25 25:5 28:16 29:4 83:25 84:1 93:4,12 95:3, 22 97:13 138:16 139:3,11 146:22,23 147:3 151:15 158:6</p> <p>lieutenant's 14:3,6</p> <p>lieutenants 19:5,16 20:17 25:4 29:1</p> <p>life 74:5 87:14</p>	<p>life-threatening 87:10,14</p> <p>like 7:9,19,20 11:5 13:6 16:17 18:24 19:23 21:2,22 25:1 29:12 31:22 35:1,4 36:2,5 38:9 40:19 41:23 42:24 46:21 63:1,20 64:9,10 66:13 69:4 73:19 76:6 98:11 106:9 127:19 128:18 138:6 142:8 149:18,25 150:3</p> <p>liked 63:15</p> <p>likely 32:2 85:24</p> <p>limit 122:18 127:23</p> <p>limited 98:17,19</p> <p>limits 88:21</p> <p>lineup 26:25</p> <p>links 44:10</p> <p>listed 42:20 122:5</p> <p>little 8:16 11:17 12:15 13:1,24 14:7 20:6 22:20 27:1 36:12,14,19 43:19 57:21 83:21 105:2 121:24 151:25</p> <p>lived 22:19,22</p> <p>lives 81:12</p> <p>Lloyd 93:13</p> <p>local 63:7,8</p> <p>located 8:4 26:20</p> <p>location 15:21 29:16</p> <p>logistics 14:17 16:1</p>	<p>long 7:4 8:6,11,14, 25 9:13 10:7 11:7, 16 12:18,20,25 13:21 14:4 15:16 16:3 86:8 122:11 128:4 132:22 133:1 154:14 157:3 158:24</p> <p>long-term 124:17</p> <p>longer 36:12,14,19 53:25 54:24 55:9 58:19 60:14 124:19 132:5,9</p> <p>look 22:10 23:2 24:9 31:20 40:19 46:21 47:12 69:22 82:11,12 106:9 109:24 115:10 118:4 120:22 131:14 148:10 154:20 158:8</p> <p>looked 7:8 22:13 23:8 33:19 66:1,3 110:19 111:7 117:23,25 118:7</p> <p>looking 23:10,12 25:16 155:1</p> <p>lookout 26:8</p> <p>looks 70:15 76:11 137:3 144:6</p> <p>loss 86:3</p> <p>lost 34:8</p> <p>lot 25:19 27:17,18 77:24 150:12 157:14</p> <p>lunch 66:11,14,16, 19,23 67:3</p>	<p>M</p> <p>mace 82:2,21</p> <p>machine 26:5</p> <p>made 26:9 32:9,11 33:8 42:13 48:13, 16,24 52:25 53:17 114:4 115:14 117:1 126:8 132:13 137:2 142:11 143:5,24 144:6,13,14,15 145:8,13 146:13 154:11,13 156:9, 13,24,25 157:20,23</p> <p>mailed 24:5</p> <p>main 42:25 60:4</p> <p>maintain 20:8 90:14</p> <p>major 7:20 15:20, 22 16:4 67:21</p> <p>major's 19:7</p> <p>majority 48:16</p> <p>make 30:24 31:7 48:15 52:17 66:20 88:10 92:2,21 117:3 123:17 154:9,16</p> <p>maker 24:21</p> <p>makes 44:18 92:17</p> <p>making 9:6 13:13 33:2 78:16 134:25 157:17</p> <p>male 69:12 126:4 127:3</p> <p>manager 39:25 40:1,3 62:24 63:12, 14 64:5</p>
--	--	--	---

manner 42:14 74:5, 14 87:8,23 105:11 117:19	37:8 39:20 41:3 50:9 53:19 66:6 80:12 82:12 84:8 86:17 97:8 103:1, 12 107:20 108:19 109:23 111:5,6 113:18 117:1 118:20 125:8 132:12 138:5 141:2 142:6 148:2 149:14 152:4 153:19 156:23 157:1,10	14 119:2 125:18 129:14 131:5 132:2,6 133:12,23 134:15,21 135:4,6, 7,8,15,16 136:6 138:5,20 139:6,8, 19 141:7 145:10,15 146:2,10 150:9 154:2,7 157:21	memo 80:10,12 139:17 150:13,14
Manson 6:11			memorandum 133:13 137:3
manual 70:16 72:12 76:12,19 79:17 80:20 100:15 101:11,12			memory 111:9 116:23 135:16 158:9
manuals 72:21			men 69:12
many 10:18,22 15:3,4 25:8 30:7,9 31:15 36:9 41:4 61:9,14 78:1 82:10 96:16 98:4,10 103:2,3 120:6,11, 14,17	maybe 8:16 10:8 12:21 14:7 15:17 19:12 25:3 64:9 69:17 83:12 95:15 158:6	mean 11:25 19:19 21:16 22:15 53:22 56:14 66:2,4 73:13 75:1,5 79:8,9 86:7, 19 87:12 92:14,17 98:16 99:19 101:1 108:2 109:20 110:10 114:19 115:18 119:12 125:1 139:16 155:24 157:4	mental 117:1,4
Marine 7:3,4	MCGURL 57:6 60:21 69:25 133:9 134:8 135:19 137:14 142:17 145:22 154:24 156:2	meaning 5:24	mentioned 24:18 26:18 32:16 59:4 115:12
mark 130:6 137:9 143:6,7,9 146:6		means 73:14 74:2 78:18,20 95:7 109:21 125:3	met 31:23 33:14 147:24 148:7
marked 56:21 59:19 71:14 79:6 89:12 101:18 106:11 112:11 130:7 133:21 135:21,22,25 136:14 137:11 143:11 146:8 148:20 155:2	me 4:6 12:17 15:7 16:16 17:5,24 18:24 22:13 23:25 24:17 27:18 31:8 32:6 35:6 37:14 38:22 39:16 43:19 44:4,5,14,19,21 46:17,18,20 47:9, 23 48:6,8 49:1 50:2 51:2,6 52:13,22 53:9 55:17 56:3,11 57:20 59:12 60:15, 23 62:5 66:17 67:9 69:16,17 70:7 73:14 74:2,12 76:2 77:19 78:17 79:11 98:16 100:22 101:2 103:7,18 104:3 106:8 108:10 109:21 111:24 116:17,18 117:12,	medical 88:1,4,6, 11,16,23	metal 139:13
marking 59:18 71:13		medication 6:1	method 103:19
Martin 9:21 151:15		medium 46:14 105:22	methods 78:14
matter 4:24 33:10 66:17 96:13		meet 31:24 32:4 33:1,8,13 148:4	Michael 57:4 60:19 69:23 135:17 137:12 145:20 156:1
mattered 39:4		meeting 33:16 148:1	military 6:16,19 7:1,2
mature 65:24		meetings 13:12	microphone 68:8
may 19:12 20:6 21:20 25:12,22 29:3 32:18,19 35:8 36:12,14,18,22		member 80:9 86:4 97:14,15,16 99:7 108:24 126:20	midyear 43:14,20
		members 9:8 19:15 95:18,20 97:11,18 153:5	might 16:8 25:5,20 30:15,16
			mind 4:19
			mine 17:11 107:3
			minor 111:5,12
			minute 127:12,15
			minutes 99:23 122:14 128:20 129:2,6
			missed 27:13

<p>missing 25:12 26:14 44:10</p> <p>misspoke 49:21</p> <p>mistaken 59:24</p> <p>mistreatment 103:8</p> <p>misunderstood 101:2</p> <p>moment 18:17 62:13 106:14 125:9 137:2</p> <p>Monday 143:16</p> <p>monitored 13:10 99:21</p> <p>month 10:8 30:10, 15</p> <p>months 30:16 45:2, 3 143:22</p> <p>more 8:16 10:9 13:2 14:7 40:6,7 44:21 62:25 83:21 99:2,4 103:7 104:13 121:21,24 124:9 154:11</p> <p>morning 4:7,8,9 57:23</p> <p>most 10:5 14:17 24:5,9 30:25 32:1,2 65:23</p> <p>mostly 21:7 103:24</p> <p>motel 10:5 12:14</p> <p>motor 15:13 34:10</p> <p>motorcycle 15:14</p> <p>move 15:24 55:24 79:3,8 86:24 88:1 112:8</p>	<p>moved 10:3 29:9</p> <p>Mr 4:13,17,20,21 23:1,3,6 47:1 50:20,24 51:18,23 52:6,10 55:19 57:6, 7,16,18,22 58:3,8 60:21 62:8 63:25 66:12,21,25 67:2 68:10 69:1,25 70:5 75:23,24 99:24 100:5 112:9,12,18 120:7,12,15 127:12,16,19 128:3,6,9,15,20,24 129:4 130:14,16,19 131:9,22 132:10,17 133:9,16 134:1,6,8, 10,16,25 135:6,18, 19 136:7,20 137:2, 14 139:25 140:3 142:12,17 145:12, 22 147:5,8,18,19 148:4,7,22 152:10, 17 153:2,14 154:9, 16,19,24 155:8,21, 24 156:2,10,13,16, 21 157:24 158:20 159:3</p> <p>Ms 4:5,23 5:7 22:25 23:5,7 50:23,25 51:21 52:4,8,11,12 55:17,21 56:19,22 57:4,14,17 58:1,5, 10 59:17,20 60:19, 22 64:1 66:9,15,18, 24 67:1,4 68:8,11 69:23 70:1 71:12, 15 75:22 76:1 79:4, 7 86:6 89:10,13 92:12 98:3 99:22 100:1,8,20 101:16, 19 106:13 112:10, 16,20 121:14 127:14,17 128:1,4,</p>	<p>8,12,18,22 129:10, 13 130:6,10,15,18, 23,25 133:2,7,11, 14,19,22 134:1,5,9 135:14,17,22 136:1,12,15 137:9, 12,15 140:5,13,20 142:14,18 143:6,9, 12 145:20,24 146:6,9 147:7,10 148:20,24 153:15 154:22,25 155:3, 15,17,23,25 156:5 158:18,22</p> <p>much 4:12 17:10, 13 20:6,7,18 21:14 34:13 42:8 143:24 144:1 151:16</p> <p>multiple 32:11</p> <p>municipal 7:17</p> <p>music 63:9,11,21</p> <p>must 82:19 102:17 118:17</p> <p>mutual 115:16,18</p> <p>my 4:14 5:11 6:6,16 7:7,10 12:9 15:23 16:5 17:5,8 24:4 34:9,13 37:12,13 47:19 48:4,17 51:16 62:20 67:17 68:23 69:8 71:11 83:25 97:22,23 103:4 104:13 105:5 116:10 118:10 128:1 133:13 135:15 139:1 142:10 148:6 153:9 157:5 158:9,12</p> <p>myself 10:24 11:3 13:4 33:18 143:19 147:24</p>	<p>N</p> <p>N.C.G.S. 114:12</p> <p>name 5:11 6:4,6 17:17 21:5 56:14 66:8 67:25 70:17 76:15 77:16 97:25 101:20 112:25</p> <p>named 27:6</p> <p>names 17:14 90:23</p> <p>narcotics 26:17</p> <p>narrative 90:3</p> <p>national 114:11,16</p> <p>nature 78:13</p> <p>near 154:14</p> <p>nearly 139:2</p> <p>necessarily 20:10 47:7 53:9 85:11 102:24 118:1 123:12</p> <p>necessary 53:18 81:10 111:15 122:9</p> <p>neck 89:23</p> <p>need 47:11 50:17, 18 51:2,4 54:3 57:16 61:6 102:18 106:14 111:18,20 117:23,25 127:14, 15,21</p> <p>needed 18:12 24:12 27:22 35:17 53:25 55:9 60:14 132:5,9 139:12</p> <p>needing 77:22</p> <p>needs 110:19 111:7</p> <p>negative 115:4</p>
--	--	--	---

negligence 138:15 never 17:5 48:2,3 64:11 73:9 153:4 new 20:16 43:17,21 55:2 newer 133:3 next 7:6 10:10 11:11 12:22 13:25 14:14 15:19 16:10 17:25 29:14 31:2 34:16 35:15 42:3 44:7,8 52:1 53:14 54:22 59:3 88:13, 14 123:21 132:4 138:23 night 41:18,19 129:9 nights 103:2 nine 15:8 no 5:20 6:1 8:1 11:2 13:19 20:5,10 23:3 27:3 28:4,6,18,22, 23 29:15 30:23 31:16 32:23,25 33:13 35:3 36:4,16 38:12 39:9,23 41:11 42:10 43:12 46:5 47:25 48:3 49:2,8,9,13,14 51:5,9 52:16 53:25 54:20,23,24 55:8, 16 57:14 58:19 60:14,17 61:8,11 63:6,19,22 65:4,11, 19 69:6,13 70:24 72:8 74:20 75:13 76:24 77:17 79:21 80:14,17,22 81:21 83:20 86:16 88:6 90:19 92:20 96:24 98:7,19 100:22,24	101:1 102:18 106:1 108:7 113:18 114:24 115:1,5,21 116:3 118:1 119:3, 5,23 120:1 122:18 124:9,18,21 126:16 127:8,21 128:9 129:19 131:11,18 132:5,8,19,24 135:12 138:22 139:1 143:8,23 147:15,17 148:13 150:10 153:4 155:10 156:11,15, 22 157:18,24 158:12 nobody 65:24 non-certified 19:3 28:15 none 36:13,17 147:17 156:22 nor 61:3 normally 24:7 25:1, 2 30:6,23 31:25 40:2 41:21 42:11 53:4,23 63:6,12 66:4 82:17 123:24 124:4 North 6:11,13 8:21 9:22 14:13 15:12 81:16 not 5:3,4,20,25 8:4 10:19 15:17 17:8 18:8 19:3,12 20:5, 7,10 22:3,23 25:10 26:21,24 27:3 28:6, 22 29:4,25 30:16 31:8,16 32:19 34:13 35:3,19 37:4, 6,9 39:13,15,17 42:1 45:20 46:5,22 48:3,7,10,13,21	49:8,9,10,14,16 51:5,14 52:4,9,19, 21 53:8 54:9,11,20, 24 55:14 57:18,22 59:8,24 60:10 61:11 69:14,17 70:24 71:21 72:3, 11 73:23 74:19 75:13 76:24 77:17 78:9,15,19 79:9 80:22 84:19,24 85:11 86:16,17 87:4 89:6 90:21 92:11,18 93:5,20 94:16 96:1,24 98:7 99:15 100:24 102:7,24 103:16 104:9,10,23 105:4, 8 106:1 109:18 114:18 115:20 116:12 118:1,9 119:22,23,25 121:19 122:7 123:2,12,20 124:9 127:22 128:9 129:7,16 131:14 132:20,24 135:6 138:6 141:1,2,20, 21,25 142:8 143:23 144:9 148:1 152:5, 12 154:1 156:11,15 157:5,11 158:12,13 note 55:4 89:11 117:1,4 noted 138:14 notes 31:19 45:19 nothing 9:6 notice 56:6 136:10 November 18:4 now 11:10 21:19 37:25 51:4,5 54:11 56:5 66:18 75:20	82:22 93:9 110:10 139:4,23 154:6,14 155:11 number 19:12 22:13 39:1 51:24 56:21 59:19 64:16, 25 71:14 79:6 89:12 93:11,20 96:20 101:18 102:15 106:11 112:9,11 120:13,16 133:21 134:22 135:25 136:14 137:11 143:11 146:8 148:23 numbers 20:5 nursing 7:21 <hr/> O <hr/> oath 6:2 objection 51:18,22 63:25 147:5,7,8 153:14 obligation 109:16, 24 observation 118:12 119:14,17 observations 118:15,17 observe 118:16 119:13 observed 118:20 obtain 99:6 obviously 23:16 93:10 OC 82:21 84:10,14, 23 89:24
--	---	---	--

occasion 89:21 Occasionally 26:10 occasions 40:4 89:25 occur 53:10 71:19 78:12 104:10 occurred 4:25 10:10 11:11 35:15 42:3 61:21 144:22 156:4 157:6 October 155:6 156:3 of 4:11,15,19,24 5:5,12,20 6:19,20 7:1,20 8:18 9:20 10:5,15,25 11:2,12 12:3,23 13:10,15 14:13,15 15:17,20 16:7,8,9,13 17:1,2, 23 18:4,5,22 19:3, 15 20:5,22,24,25 21:15,23 22:13,22, 23,24 23:10 24:4,9, 24 25:1,19,21 26:15,23 27:1,5,17, 18 28:5,11 30:19, 20,24,25 31:5,9,19, 25 32:20 33:15,18, 24 34:13,18,19 35:11 36:8 37:7,18, 24 39:1,19,21 40:9, 16,18,24 41:12,17 42:20,21,22,24 43:1 45:2,3,11,22 46:10,13 47:6,9,23 48:6,16,23,25 49:5, 15,20 50:2,11,13 51:6,19,24,25 53:2, 16 54:1,4 55:14 57:10 58:1,6 59:3, 13 60:15 61:2,15, 18,24,25 62:11,22,	23 63:7,11,16,24 64:3,12,16 65:1,3, 23,25 66:7 67:8,18, 20 68:14 69:4,15 70:18,25 71:3,6 72:3,10,11,18 73:2, 4,5,6,8,9 75:8,16 76:15,16,17 77:2, 15,16,18,23,24 78:3,10,13 79:16, 25 80:7,9 81:1,4,8, 12,15,25 82:8,22 83:10,13 84:8,9,13, 14,15,22 85:2,14, 17,24 86:4 87:2,13 88:14,21,22 89:9, 15,16,20,22 90:4,6, 9,11,13,14,17,24 91:22 92:4,6,8 93:1,2,3,4,7,11,13, 18,21 94:4,8,10,17, 21,22,23 95:1,4,10, 15,17,25 96:13,23 97:5,7,8,10,13,16 98:4,14,18,23 99:3, 5,9,20 101:5,12,15, 20,25 102:2,3,7,15 103:8,9,19 104:16, 20,21 105:4 106:21 107:1,6,12,23 108:13,25 109:2, 14,17 110:5,9,11, 20,21,23 111:4,23 112:2,12,25 113:9, 15,17,19 114:2,8, 21 115:4,8,13,16, 21 116:4,11,12,13 117:1,4,11,17 118:2,9,18 119:7, 10,23,24 120:7,8, 12,15,18 121:4 122:4,9,24 123:9 124:6,9,23 125:3,5 126:3,20,22,24 129:18,22 130:2,3,	11 131:9,10,14,15 132:22 133:23 134:3,13 135:3,4, 10,11,13 136:3,10, 20 137:7,16 138:6, 15 139:2,12,20,21 140:9 141:3,9,11, 13,14,16 143:13 144:22 145:1,5,9 146:10 147:11,14, 23 148:1,12 149:3, 23 150:12 151:4 152:3,7,23 153:5, 12 155:4,6,8,9,12, 15,23 157:1,14,25 158:4,8 off 5:2,6 26:23 35:8 58:2 67:5 74:6 76:25 86:22 103:3 offend 115:5 offended 115:21 offender 122:10 offense 121:20 offer 38:22 83:16 offered 22:8 offering 88:22 office 4:11 12:3,24 14:2,8,12 17:22 18:6,23 19:10,16, 20,21 20:1 21:24 24:17 25:9 27:17, 25 28:18 29:10 35:5 36:5 48:17,25 50:11,15 54:2 65:5, 15 76:18 77:20,24 79:17 80:9,20 81:9 84:9 85:5,10,15 90:10 92:3 93:6 94:21,25 95:9,25 96:15 97:10 100:15 106:8,24 107:25	110:13 113:4,18,23 114:3,21 133:13 138:16 139:9 142:6 148:6 153:6 156:8 office-issued 84:7 officer 8:1,2,13 20:16 36:8 40:20 42:21 60:1 69:15 73:3,7 74:22,24 75:5,12 80:9 81:12 95:1 129:17 134:18 officers 15:3,4 33:25 42:16 43:4 62:25 65:9,13 66:5 75:15 81:17 82:24 Offices 5:12 76:12 official 94:19 often 71:8 72:1 oftentimes 25:23 60:13 Oh 57:24 96:13 104:15 134:7 139:25 143:4 okay 4:9,23 5:9,10, 11,19,23 6:18,21, 24 7:12 8:3 9:17,19 10:2,22 11:7 12:11, 18,22 13:21,25 14:14 15:19 16:3 17:18 18:2,17 21:23 22:25 23:3, 14 24:23 25:7 27:4, 14 28:8,24 29:22 30:14,17 35:4 38:2, 10,13 40:8 41:13 43:4 44:10,15 45:14 46:19 47:9, 21 49:2,5,23 50:2 51:4 54:18 55:19 59:4,11 60:5 63:11 66:9,18,22,24 67:1
---	---	---	---

68:12 69:14,21 70:5,12 72:1,22 73:19,21 74:11,21, 23 75:10,18 76:8 77:4,5 79:3,14 80:25 85:19 86:24 88:3 90:9 91:2,11, 14 95:6 96:25 98:2 99:1,22 100:6,7 101:5 106:16 110:13 111:21 112:12,18,19 116:13 118:11 123:21 124:25 130:2,6,10 131:4 132:8 133:2,10 135:24 136:5 137:3 138:9,11 139:14, 22,24 140:3,4,12 142:5,14 143:6 144:21 145:20,23 146:16 147:18 150:1,17 152:16 153:1 154:7 156:6 158:20 159:2	74:6 76:20,25 78:5 79:3,8 82:10,17 83:2 86:12,22,24 88:1 89:21,25 91:4, 10 93:7,9,16,20 94:3,9,11,18 95:24 96:1,22 97:9 98:24 103:3,16 104:16,20 105:3,21,23 106:2, 7 108:13 111:4 112:2,8 114:10,15 115:24 116:24 117:19 118:5,15 119:11 120:17 122:13,15,18,22,23 123:17 124:13 126:12 127:21 128:1,6 129:11 134:16,23 136:3,16 138:5 139:1,13 141:3 142:3,22 143:16 148:13,15, 23 150:1 151:6 152:14 154:21 155:18	97:12,14,15,17 99:1 104:2 105:10 117:5 124:19 125:7 127:1 136:24 138:5,18 141:1,8, 10 147:12,20,23 148:2,3 149:14,23 151:2 152:12,15 153:23 154:12 157:10 158:4 One's 7:16 ones 24:11 82:17 151:16 online 24:4 only 37:17 59:25 62:10,12 68:23 69:7,19 71:10,16 81:9,14 84:7 90:1 104:2 106:2 138:18 153:7,23 154:3,5 onto 75:18 open 65:13 opening 12:16 openly 47:13 158:10 Operations 97:19 opinion 67:17 105:5 opportunity 106:17 126:12 136:11 opposite 78:22 opposite-sex 78:14 or 6:19 7:9,12,19, 21,25 9:7,11 10:9 11:1 13:1 15:6 16:7 17:1,2 18:7,20 19:2 21:9,21 22:23 23:20 24:5,12 25:23 27:7 28:9,25	29:6,14 30:6,10,15, 16,22 31:8,23 32:18 33:11 35:2 36:22,25 37:1 38:7 39:4,14,18 40:6,9 41:3,4,6,10 42:3 43:10,20 44:20 45:23,24 46:16 47:18 48:7 49:9,12 50:7 53:3,4 54:3,6 55:4,13 59:3 60:24, 25 63:4,5,18 64:5, 10 65:17,25 67:12 68:1 69:17 70:9 71:22 73:9 76:6 77:14 80:13,16,20 81:12 82:16,21,24 83:13,19 84:15 85:9,24 86:1,3,4 87:6,14,21 88:22 89:21,23 90:5,6,7 91:12 92:18 93:12 94:15 95:11,14,16 96:20 97:17 98:5, 17 99:2,3,4,5 100:6 101:11 102:7,8,10 103:3,8,20 106:3 108:19 109:22 110:3 111:12 112:9 114:1,5,10,11,13, 15,16,17 115:4,20, 21 116:5,16 117:3, 5,8,12,17 118:7,19 119:7,8,15,17 121:4,18,21 122:11 124:2,13,19 125:12 126:17 129:16 130:3 131:13 132:25 135:7 136:23 137:1 138:6 141:1,21 142:6 144:1,15 145:6 147:12 148:2,12 149:15 152:4,10,13 153:12,13 156:4,10
oleoresin 84:10 Oliver 131:7 on 4:11,16,25 5:5, 24 7:22 9:12 14:2, 21 15:6 19:25 20:14 22:8 24:10 26:8 27:21 30:7,10 32:1,14,15,16,17 33:11,12 34:1 35:23 36:9,10,11 38:19 39:14 40:3, 21,24 41:8 42:18 45:4,22 47:4,8 48:5 50:10,13,21 52:18, 24 53:3,21,23 56:20 58:19 59:10, 14 61:2 63:3 64:15 67:11,13,17,22 68:14 70:20 72:12	onboarding 36:4 once 12:15 24:6 33:7 34:19 35:13, 16 44:3 77:9 80:3 97:21 104:3 111:19 115:6 one 7:17 10:15 13:4 19:1 22:13 25:12 27:13 29:3,9,12,13 32:12 35:12 39:19 44:21 48:11 51:12, 13,15,17,19 56:7,9, 12 61:6,19 62:12 63:7 65:21 68:23 69:19 71:10,16 74:18 80:10,23 82:13 83:13,25 86:17 90:25 93:13, 16 94:8 96:19,20		

<p>158:6,7</p> <p>oral 102:20 103:10, 11,13,21,22</p> <p>order 87:5 89:25</p> <p>ordered 138:20</p> <p>orders 78:16</p> <p>ordinarily 41:23 43:17</p> <p>organ 86:4</p> <p>organization 35:2 114:2</p> <p>organized 21:1</p> <p>orientation 110:24 114:22 115:15 156:14 157:13</p> <p>origin 114:11,16</p> <p>other 6:15 7:16 11:3 13:4 27:23 35:8 46:25 49:14 58:24 60:9 62:24 66:1,6 82:12 83:9 84:14 88:17 89:16 95:25 98:18 102:10 114:1,17 117:5 118:18 124:7,18,19 132:16 148:2,8 153:5</p> <p>other's 66:7,8</p> <p>others 21:4 36:13 83:21 93:14 108:8 156:23</p> <p>our 15:14 65:23</p> <p>out 6:19,20 9:7 12:3,15 21:21 25:16 26:17 30:4 41:17 42:24 47:18 66:1 67:19 78:25 83:23 95:1 147:2</p>	<p>151:4 157:14,15</p> <p>outcome 115:13,16 147:11</p> <p>outline 102:3</p> <p>over 11:17 13:24 33:20 35:9 44:17 45:8 50:1 51:10 61:10 107:20 108:17 141:19 151:25</p> <p>overall 20:16 45:24</p> <p>overseas 9:11</p> <p>own 17:8 21:18 27:1 38:10 41:9 63:19</p> <p>Oxford 8:9</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P.M. 159:5</p> <p>pa- 10:13</p> <p>page 71:3 76:16,17 77:2,18 78:3,5 79:24 85:17 86:25 88:1 89:9 91:11,12 98:24 101:5 107:6 116:13 138:8</p> <p>pain 86:3</p> <p>panel 24:25 30:18, 22,24 31:6,12,22, 23,25 32:1,18 33:7 131:12,13,14,16</p> <p>paper 14:23</p> <p>papers 14:23 26:2 43:2</p> <p>paperwork 13:11 27:16,23 35:23</p>	<p>para- 84:17</p> <p>paragraph 73:24 101:23 113:16 138:10,24 143:15 144:5,11,12</p> <p>paragraphs 101:24</p> <p>paraphrase 73:15, 16 74:12 84:17 87:11,16</p> <p>parents 12:9</p> <p>part 14:13 24:3 40:16 76:6 89:22 129:23,25</p> <p>particular 25:15 32:10 53:3,4 58:19 61:21,23 70:9 75:14 80:23 101:13 109:12 113:13 118:6 124:14</p> <p>particularly 21:18 34:2</p> <p>parties 115:17</p> <p>partner 26:15 124:10</p> <p>parts 14:22</p> <p>party 73:9 77:23 116:22,25</p> <p>pass 24:10 33:11, 12</p> <p>patients 26:14</p> <p>patrol 6:16 8:22 9:24 14:21,24 15:9 25:11,13,14 26:11, 23,25 27:6 29:14 41:11 42:18,19,21 65:14 72:14 95:21, 22 97:14 139:1</p> <p>patrolled 10:13</p>	<p>42:25</p> <p>pattern 99:9 138:14 141:14</p> <p>patterns 131:15</p> <p>pay 16:18 21:25 37:24,25 38:3,5,10, 12,15,16,22 39:3,5, 8,12,13,17,20,23 40:4,6 74:9 123:25 125:20 134:1,6,10</p> <p>paying 25:15</p> <p>payment 37:19</p> <p>payroll 20:1 58:17, 20</p> <p>pens 14:23</p> <p>people 9:3,12 10:18 14:18 16:20 18:11 19:25 23:12 24:5 33:21 35:6 40:22 43:17 45:1 48:9 50:5,15,16 61:9,14 62:24 64:19 65:16,24 73:4 93:11 139:7 158:5</p> <p>per 52:16</p> <p>percent 78:19</p> <p>perfect 23:15</p> <p>perform 23:20 122:20 141:17</p> <p>performance 43:8, 9,14 45:5,9,17,23 94:18 105:14,19 135:1,5 136:23 148:15</p> <p>performed 42:13 85:7 122:25</p> <p>performing 92:7</p>
---	--	---	---

<p>period 36:8,14,15, 16,17,18 37:2,11 44:9 45:1 51:11 61:2 99:4 124:13 134:17</p> <p>permanent 10:4 85:25 86:1,3</p> <p>permit 5:4</p> <p>person 11:14,15 23:18,19 26:19 32:1 33:14 52:22 53:19 54:2 62:4,6 67:12 74:4 86:17 89:1,22 103:23 107:21 108:16 109:6,18 111:9 112:1 124:1,2 154:5</p> <p>personally 33:2 147:21</p> <p>personnel 56:25 62:25 78:13 106:22 112:1 113:24 147:9</p> <p>persons 88:12 114:1</p> <p>pertaining 133:15 141:10</p> <p>pertains 125:7 142:12</p> <p>Peter 4:2 6:6 134:24</p> <p>petition 17:22</p> <p>phone 31:1 67:12 104:25 107:20 108:18 139:25</p> <p>physical 81:13</p> <p>pianist 63:18</p> <p>piano 63:13,14,22, 23</p>	<p>Pitt 9:21</p> <p>place 44:22 90:11 156:7</p> <p>places 9:9 18:11</p> <p>plane 9:11</p> <p>planned 30:8</p> <p>platform 16:24</p> <p>play 63:11,13,14,21</p> <p>please 6:4,9 44:21 48:7 50:3 60:20,23 69:23 70:7 71:4 76:2 79:11 91:19, 20 97:25 106:20 112:24 116:16 121:13 127:13 128:3,16 134:21 139:21</p> <p>point 15:1,5 22:6 35:21 38:3 43:4 44:11,18 46:12 54:14 65:5 69:21 89:7 103:11,25 117:6 122:8 132:7 144:14,15 148:17 152:12 156:19,25 158:22</p> <p>police 8:1,2,3,9,13 62:25 65:13 70:18 73:2</p> <p>policed 21:15</p> <p>policies 4:16 66:11 69:22 70:23 71:1 72:2,6,7,10,15 75:19 76:21 79:1 151:20</p> <p>policy 70:2,8,10,11, 15 71:6,8 72:4,12, 18,20 75:22 76:12, 18,23,25 77:2,8,11, 13,19 79:9,12,15,</p>	<p>17,20,22,25 80:2,4, 15,18,19,20 81:8, 16 84:16 86:18,21 90:23,25 91:15 92:3,6,14,15,22 94:15 95:11,12,14, 17 100:9,12,15,16, 18,21,23,24,25 101:3,4,6,10,15,20, 25 102:11 106:24 107:2,4,10,13,14, 18 108:1 109:17,23 112:7,22,25 113:3, 5,7,10,12,17 114:20 115:12 116:8,10,11 117:7 118:6 130:3 145:3 151:19</p> <p>political 73:9</p> <p>poor 72:19</p> <p>portion 80:8 101:11</p> <p>position 10:7,14,21 11:8,21 12:20,25 13:22 14:3,6 15:16 19:7,8 20:15 89:2,4 121:4 125:1,2</p> <p>positive 37:4,7</p> <p>possibility 77:22</p> <p>possible 59:2 88:11 108:10 109:17 117:24</p> <p>possibly 30:6 87:14 111:24</p> <p>potentially 118:16, 22,24</p> <p>practice 40:10,12 64:14 69:3 103:14</p> <p>practices 4:16 67:6</p> <p>precise 127:23 129:8</p>	<p>precisely 71:22</p> <p>preliminary 4:24</p> <p>prepare 16:22</p> <p>prepared 5:23 6:1</p> <p>presence 46:16</p> <p>present 53:11</p> <p>presentation 102:1</p> <p>presented 132:2</p> <p>pretty 17:13 19:13 20:18 34:13 42:8 127:24 130:3 132:25 151:16</p> <p>previous 49:25 54:25 143:18 144:19,21</p> <p>primarily 21:10 26:10 131:14</p> <p>primary 17:19 72:25 73:2</p> <p>print 72:20</p> <p>prior 48:17 50:7 62:14,25 84:9 91:23 92:16 132:17 139:12</p> <p>priority 77:21</p> <p>private 9:10 74:19</p> <p>pro 114:14</p> <p>pro- 5:16 52:17</p> <p>probably 14:6 15:5 18:19</p> <p>problem 21:14 57:12</p> <p>procedure 47:3 69:5 70:15 76:12 84:23 101:21 102:1,4,10</p>
---	--	--	--

<p>procedures 92:4 94:20 95:9 102:6</p> <p>proceed 32:10 53:15</p> <p>process 16:16 18:21 22:2 24:20, 25 25:6 34:18 36:1 37:15 40:18 41:1 43:10,12,20 44:21, 22 46:6,9,20,21,23 52:14,16,18,19,21 55:23 56:11 67:7, 10 94:24 98:15 118:19 124:2</p> <p>processed 94:19 95:8,12 108:1,12, 22</p> <p>professional 35:12 74:14</p> <p>progress 138:22</p> <p>prohibited 81:20 118:21</p> <p>prohibits 113:23</p> <p>prolonged 86:3,5, 7,9,11,17</p> <p>promoted 9:20,25 11:12 12:23 14:15 15:20 18:20 97:22</p> <p>promotions 18:18</p> <p>prompt 102:1,5</p> <p>promptly 114:3</p> <p>properly 40:24</p> <p>property 25:15,17 33:24 43:1</p> <p>protect 42:25 81:3</p> <p>protected 114:17 115:7</p>	<p>protecting 25:17 81:12</p> <p>protection 9:3 73:3</p> <p>protracted 86:1</p> <p>provide 6:9 50:12 51:6 60:8,10,16 61:7 72:9,17 82:15 101:25</p> <p>provided 5:16 54:9 72:11 82:13 83:14 93:6 108:1 132:6</p> <p>provides 107:14</p> <p>providing 109:18 110:12,14</p> <p>proxim- 145:6</p> <p>proximity 119:19 145:7</p> <p>public 17:4 21:21 74:13 75:3 81:3</p> <p>pull 69:23 133:4 134:5,6 135:17 137:12 142:15 145:20 154:22,25 156:1</p> <p>pulling 70:5 130:10</p> <p>purchasing 14:21</p> <p>purpose 33:15 102:3 124:23 131:14</p> <p>purposes 4:19 139:20 146:17</p> <p>pursuant 107:17</p> <p>put 18:11 31:7,11 32:17 103:12,24 130:20,21 148:23</p> <p>putting 121:7 130:17</p>	<p>Q</p> <p>qualifications 37:24</p> <p>quarter 30:10 99:3</p> <p>question 5:3 50:21, 23,24 51:1,16 52:2, 3,5,7,9,10 100:19 104:13 110:7 120:10 134:4 142:25</p> <p>questions 4:11 31:5,9,13,17,21 32:16,19,21 45:22 49:2 53:12 72:24 108:18 112:15 128:17 134:20 158:25</p> <p>quick 146:15</p> <p>quid 114:14</p> <p>quite 143:2</p> <p>quo 114:14</p> <p>R</p> <p>race 17:2 54:13,14 114:10,15,25 115:15 126:3,24 137:8</p> <p>races 21:6</p> <p>racial 110:21</p> <p>radio 40:24</p> <p>raise 134:2,6,10</p> <p>Raleigh 14:2,4,8, 12,16</p> <p>ran 17:12 35:1</p> <p>range 121:2</p>	<p>rank 9:20 10:25 11:12 12:23 14:15 15:20,24 97:13 125:20</p> <p>rating 45:24</p> <p>ratings 45:23</p> <p>Ray 84:1 138:16</p> <p>re- 34:20 48:13 106:1</p> <p>re-swear 49:24</p> <p>reach 30:4 44:12 105:22</p> <p>read 51:24 57:19 70:4 71:6 72:25 73:23 74:16 76:6, 15 77:5,19 78:4 79:24 80:25 81:6 84:5 85:20 87:2 88:4,13,19 89:19 91:18,19 92:23 94:14 97:1 98:21 101:8,15,20,23 107:7,12,23 109:14 112:14,16,21 113:9,15 114:7 116:16 118:14 120:25 138:12 139:19 141:15 143:13,15 144:17 146:15 149:5 155:4,18</p> <p>reading 90:25 138:19,23</p> <p>ready 66:15 79:12, 13 120:24 127:19 128:10,16 129:10</p> <p>real 21:2,3</p> <p>really 27:3 29:25 46:22 48:18 64:23 122:18 124:9,18</p>
---	---	--	--

154:1 rear 139:13 reason 47:4,8,10 58:24 60:16 reasonable 92:19 reasonably 81:10 reasons 60:8,24 recall 15:4 21:5 28:14 42:23 49:14 50:4,6 51:9,12,17 60:2,17 61:3,4,6 62:12,16 64:24 68:23 71:11,18 77:9,16 78:1 80:3, 12,23 93:14,17 96:24 98:4,13 104:2 105:10 120:13,16 123:2 125:7,9,14,16 126:5,14 129:16, 19,20,22,24 131:23 132:1,7,11,12,19, 22 134:25 141:18, 23 142:2,5,11 145:7 149:18 150:23 154:7,12,18 155:7 156:9,12,16, 20 receive 30:3 77:24 84:11 122:3,4 134:10,17 147:19 148:8 received 24:7 78:1 80:7,10 93:21 104:4 111:6 138:5 140:6 148:17 149:10 150:4,21 152:14 receives 107:22 receiving 109:6	111:9 116:21,22,25 recently 45:1 83:14 recognize 58:13 59:14 70:13 137:22,24 142:19 recognizes 77:21 recommend 13:19 recommendation 31:8 32:9 33:8 53:17 131:22 132:3 recommended 34:21 35:13 record 5:1,2,6 6:5 22:20 56:19 58:2, 15 59:17 71:12 79:4 94:19 112:24 122:1 127:21 128:6 129:11 133:19 138:13 147:9 155:4,18 record's 146:17 recorded 111:3,25 recording 107:15 recreation 7:17,18 reduced 125:19 reduction 125:20 reference 143:18 referred 14:18 25:23 referring 56:23 93:25 99:11 126:10 reflect 56:19 59:17 61:2 71:12 79:4 133:19 refresh 158:9 refresher 95:15	regarding 143:4 144:13,19 regardless 17:1 57:10 regular 13:11 30:22 34:1 regularly 93:18 rejection 123:9 related 37:10 110:23 relates 4:17 105:18 relationship 153:1, 4 relationships 65:21 78:12 relevance 63:25 relevant 53:13 religion 114:11,16 remained 9:2 15:21 remedial 114:5 remember 17:12, 13,14 44:25 80:11, 14 93:11,12,16 95:23 96:20 111:6 133:1 138:4 145:17,18 146:22 147:23 149:22 151:14,22,23 157:2,15 reminded 78:11 reminder 95:16 rep 37:22 repair 15:10 repeat 37:5 110:7 replace 65:2	report 31:4 59:13 89:21 90:4,9,17,18, 22,23,25 91:10,23 92:5,9 93:1,4 94:17,22 97:10 110:20 130:20 152:3 155:15,16,23 reported 84:16 REPORTER 57:15 68:5,7 85:22 91:19 97:24 98:2 100:19 121:12 129:2 130:9 133:6 134:3,7 135:20,24 140:9, 12,19 143:8 155:14 reports 97:5 98:5, 19 99:8 110:5,8 120:3 138:19 repository 90:14 represent 5:12 118:20 representation 95:25 representatives 113:25 114:2 represents 73:7 reputation 22:21 23:9 request 83:18 85:14 93:6 97:8 133:4,7 requested 11:20 12:19 143:17 144:18 requesting 133:16 139:5 require 47:7,10,12, 14 48:4,7,10,14 57:8 67:18 74:25
---	--	---	---

<p>75:3 82:18 103:14 109:2 117:21 required 72:1 81:5 84:16 93:5 103:23 requirement 72:3 requiring 47:19 RESERVED 159:4 resided 6:13 12:10 residence 10:5 residency 12:4 resolve 104:1,7,14 109:12 115:11 118:4 resolved 108:4,9 109:1,13 111:16, 17,19,20 117:6,24 118:1,7 resolving 107:15 resource 20:16 resources 44:6 45:21 58:18 105:25 106:2 respect 34:6 respectful 74:4 respond 69:5 140:6 145:12,15 responded 138:21 141:2 145:16 responders' 65:15 responding 147:22 response 102:4 104:5 139:14 140:8,10 141:16 142:10 152:5,7,8, 13,24 responses 5:5</p>	<p>31:20 responsibilities 125:4 responsibility 72:25 73:2 115:9 responsible 9:8 14:20 70:25 83:22 97:16 rest 153:5 restraint 89:23 result 112:4 results 86:5 111:20,21,25 retaliation 102:7 113:23 117:9,12,17 retire 16:6 retired 84:1 142:4 retirement 16:5 20:9 revealed 104:8 review 24:11 27:18 31:17 57:2,3 59:9 70:8 72:15 73:22 76:3,7 91:15,22,25 92:7,11,15 94:10, 16,23 95:5 96:4 97:1,3 98:14 99:5, 7,8 100:2,9 106:14, 18 112:21 reviewed 13:11 51:25 58:11 74:1 92:6 94:8 95:2 97:6 98:6 132:6 reviewing 92:20 142:11 reviews 135:2,5 revisit 32:20</p>	<p>Ridge 14:2 riding 37:7 40:9 right 10:8 16:25 17:1,20 24:18 30:19 32:18 37:16 49:17 58:1,3 73:18 82:22 113:21 128:4,24 144:10 146:15 148:22 150:11,19 151:24 right-hand 107:7 rights 102:9 136:23 137:7,18 147:14 riot 82:23 risk 85:24 road 6:11 14:2 20:15 97:18 Roberson 139:3,5 Robinson 4:5,23 5:7,11,12 22:25 23:5,7 50:23,25 51:21 52:4,8,11,12 55:17,21 56:19,22 57:4,14,17 58:1,5, 10 59:17,20 60:19, 22 64:1 66:9,15,18, 24 67:1,4 68:8,11 69:23 70:1 71:12, 15 75:22 76:1 79:4, 7 86:6 89:10,13 92:12 98:3 99:22 100:1,8,20 101:16, 19 106:13 112:10, 16,20 121:14 127:14,17 128:1,4, 8,12,18,22 129:10, 13 130:6,10,15,18, 23,25 133:2,7,11, 19,22 134:1,5,9 135:17,22 136:1, 12,15 137:9,12,15</p>	<p>140:5,13,20 142:14,18 143:6,9, 12 145:20,24 146:6,9 147:7,10 148:20,24 153:15 154:22,25 155:3, 15,17,23,25 156:5 158:18,22 room 72:14 117:3 rotated 41:15,18 Roxboro 11:13 rule 59:7 rules 5:4,19 37:10 57:8 78:22,23 rumors 156:9 run 16:13,14 17:24 50:15 running 16:21 runoff 17:20 runs 158:8</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S-10 139:3 S-2 139:4 S-3 138:20 S-E- 84:4 S-H-E-A-R-I-N 84:4 safe 87:8,23 88:10 safety 33:24 said 9:13 12:13 23:23 30:17 37:6 38:10,25 39:10 42:25 43:20 48:24 52:15 54:18 55:8 62:6,17 64:6 68:1 69:11,15 80:12,13,</p>
---	--	---	--

15 82:4 89:3 104:15 115:14 117:19 127:7 130:15 132:5,8 139:16 142:8 148:25 149:16,19 156:10 157:3 158:5 salary 134:18,19 same 14:9 15:23 20:8,11,19 25:6 26:22 38:7 39:7,12, 20 69:12 78:7,13, 14,15,20,21,22,23 88:17 90:17 91:1,2 102:22 103:19 121:20 130:22,23, 24 139:11 141:10 151:2,7,11 153:5 same-sex 78:10,12 sat 93:16 satisfaction 74:19 satisfactory 34:21 satisfied 134:17 saw 47:18 139:10 say 10:2 13:8 14:5 16:8 17:5,7 19:11, 14,18 21:11,19 24:16 25:20 28:20, 24 29:8 30:9,11,21 32:5 35:1 37:4,6 38:2 39:18 42:21 45:10 50:18 54:11 55:7 61:12,14 65:11 67:15 69:6 76:16 83:13 84:22 98:9,11 99:12 100:6 101:13 104:25 108:19 111:14 118:23 121:12,23 122:7 131:25 132:25	137:23 151:19 152:18 153:25 157:19,22 158:13 saying 30:2 48:3 49:9 58:6 71:16 80:20,22 85:2 86:19 117:2 119:6 126:11 135:10,12 144:7 145:11 says 59:8,23 73:14 74:15,18,22 78:24 85:20 87:20 88:4 89:15 90:24 91:15 93:22 95:8 96:3 114:7 133:25 134:15,16 136:18 146:25 scale 37:25 38:12 scan 141:7 scene 88:10 schedule 35:10,20 scheduled 22:6 31:3 school 6:19,20,22 12:8 score 45:24 46:3,4, 7 scored 46:2 screen 56:20 59:10 136:4 scroll 57:4 scrutiny 16:22 se 52:16 second 23:2 34:9 41:14 57:3 74:16 77:19 81:1 92:23 107:23 113:16 138:8 139:19	secretaries 19:23 section 28:7 29:10 70:9 78:5 84:5 85:20 89:14 96:3 99:15 101:12 113:13 114:7 120:23 sections 97:12 security 9:4 26:4 see 12:6 22:25 23:6 47:19 52:19 58:9 65:25 67:2 70:2,3 74:23 82:12 89:14 105:21 121:19 129:17,24 136:22 139:7 145:19 147:17 148:10 149:5 152:17,25 seeing 119:17 seek 89:1 seen 130:16 sees 119:15 select 95:20 self-protection 84:15 send 30:22 55:4 59:5 60:5 93:1 senior 6:23,25 32:1 seniority 82:11 sensitive 68:9 sent 9:25 10:2 49:6 55:6 58:5 147:18 149:21,22 sentence 74:15,16, 17 75:5 77:19 78:17 81:1 87:2,17 88:8,13,15 89:19 101:15 107:12,23	109:14 113:15 separate 27:10 28:6,7 38:7 separation 59:13 155:6 September 136:18 150:2 154:10,15 sequence 154:13 sequentially 57:10 sergeant 9:20 10:24,25 11:3,4,13, 23 12:19 17:21 25:4 29:3 37:8 40:9 93:16 94:2,3,6,9 95:24 97:14,17 120:19 139:3,5 151:15 sergeant's 11:21 sergeants 13:6 19:4,6 20:17 28:16 series 31:5 serious 67:15 85:21,23 serve 97:13 served 7:7 26:15 64:19,20,21 96:11 serves 26:1 135:16 service 61:15,18 62:11 73:3 74:24 75:2 services 53:24 55:8 60:14 88:23 132:5, 8 serving 43:2 74:13 75:3 set 24:13 27:22 31:9 42:1
---	---	---	---

seven 11:9 25:10 28:11 143:22 seven-hour 127:23 several 15:7,15 22:12 26:13 30:12, 14 48:9 64:24 141:3 142:2 146:21 149:19 151:24 154:11 severe 121:21 sex 78:21,22 114:10,15 sexual 110:24 114:22 115:15 156:13 157:13 sexuality 156:21 shall 81:9,13 84:11, 16 88:5,6,10,11,16 89:20 90:3,4 91:22, 24 92:8,11,25 94:16,17,21,23 97:11,13 102:7,11 108:1 shares 97:13 Sharika 5:11,12 she 69:12 82:16 89:21 135:15 154:1,2,3,5 she's 153:23 154:1 Shearin 84:2 138:16 139:3,11 sheriff 4:6,17,20 5:8 7:24 16:13,14 17:2,14 24:4,17 25:9 26:24 34:10, 23 37:13 40:14 43:13 44:23 48:13 49:25 50:5,9,11,21 52:1,13 54:25	55:22 56:10,24 57:19,24 59:7,9,23 61:5 62:21 66:13, 15,20 67:5 68:12, 24 69:8 70:2,7,13 71:9 75:9 76:2,9 79:15 84:6 85:18 87:9 89:15 92:23 96:6 97:23 98:6,21 100:2,10,12 106:17 112:13,22 117:7 118:14 123:1 129:9,10,14 131:2 133:13,24 134:24 136:9 137:17 139:6,8,20 140:1 145:25 148:22 156:6 158:16,22 sheriff's 17:22 18:6,23 19:9,16 20:1 21:24 27:17, 24 28:18 29:10 34:22 35:5,24 36:5 48:16,25 54:2 65:5, 15,18 76:12,18 77:20 79:17 80:9, 19 81:9 84:7,9 85:5,9,14 90:10 92:3 93:5 94:21,25 95:9,25 96:15 97:10 100:15 106:8,24 107:25 110:13 113:4,18,23 114:3,21 138:15 153:6 156:8 sheriffs 60:13 65:18 shift 41:3,6,10,14, 18,20 42:2 94:11 shifts 41:4,13,21 151:6 shocked 152:17,18	shooting 21:20 shops 15:10 short-term 124:17, 20 shorter 36:13,18 124:19 shortest 122:17 shortly 16:12 should 19:14 80:10 84:19,24 87:5,19 91:9 92:15 99:20 106:8 108:3,9,12, 21,23 109:9,11,13 115:16 120:1,2,4 138:14 show 54:21 144:25 showing 136:3 139:13 side 7:22 26:23 sign 46:15 75:12,14 76:25 92:25 100:16,22 113:5 123:4,6,8,13,20 signature 59:14 76:20 79:18 107:1 146:4 159:4 signatures 17:23 70:20 signed 86:22 similar 20:11 21:9 38:25 63:1 69:20 88:17 103:2 125:10 similarly 14:9,10 simple 103:2 111:13 116:25 since 71:11 77:8 142:3	Sincerely 134:22 sing 63:15,18,24 64:3,9 sir 74:17 81:7 84:3, 18 87:15 88:9 91:13 94:14 96:7 98:25 119:4 125:23 131:5 138:13 150:7 sisterly 35:2 sit 45:7 72:14 94:3 96:22 sits 44:16 93:7 sitting 4:10 121:16 158:24 situation 49:5,20 53:3 69:11 84:15 87:5,20 119:25 122:13,15,22 135:4 151:7,17 situations 21:18 81:14 141:3 six 19:17 27:5 37:3, 4,6 40:9 45:2,3 99:3 six-month 43:16,21 45:1 skills 40:22 skim 76:5 139:21 skimmed 140:4 slash 90:24 91:22 slower 91:20 slurs 110:21,23 sniff 26:17 snippets 64:12 so 4:9,12,14 5:11, 19 6:4,18,21,24
---	---	---	--

7:23 9:17 10:9 11:10 12:11,18,22 14:25 15:25 16:16 17:18 18:2,11,17, 22 19:23 20:4,20 21:15,23 23:8,20 24:15,18,20 25:8, 13 26:18 27:1,4,11 28:3,11,20,24,25 29:22 30:2,17 31:22 32:12 34:11 35:4,13 36:16 37:14,20 38:2,10, 23 39:4,8,21 40:8, 25 41:9,13 42:2,6, 9,23 43:4,19,23 44:20 45:10 46:19, 24 47:9,21 48:1,21 50:11,17 51:6,20 52:1,8,17 53:7 54:8,14,18,21 55:1 56:19 58:11 59:4 61:5 63:18 64:23 66:19,24 68:18,25 69:3,10,14 72:22, 25 74:16,20 75:18 77:18 84:22 86:9, 14 88:24 89:2,4,5,6 90:25 91:3 92:17 93:22 95:24 96:25 99:16 100:9 102:20 105:8,13,16,22 107:11 108:5 109:8,25 114:22 115:12 116:22 117:11 119:17 123:1,13 124:2,11, 20,25 125:14 126:2 127:5,11,21 129:6, 14 130:23 131:16 132:15 133:2 134:10 135:8 140:6 141:22 142:13 144:2,4,17 145:11 147:15,18 148:1,4,	14 149:2,16,18 150:3,17,21 152:3, 4,16 153:1 154:6 156:6,20 158:2,8 social 63:1 soft 82:2 solicit 151:8 some 4:15 9:3 13:17 18:15 20:23, 25 21:1 22:6 23:22, 23 24:2 25:7 26:11, 14 27:23 29:8,9 32:18 33:20 35:20 36:12,14,18 37:7, 24,25 40:3 41:3,17 43:4 44:10,11 46:13 47:5 48:10 50:5 53:16 55:24 58:1,6 60:23 62:23, 24 64:19 65:5 78:1 81:25 82:8,23 83:12,20 85:2 95:15,16 103:8,11, 25 104:17,18 108:18 115:16 132:6 139:11 144:14,15 148:12, 14,17 152:7,11,23 156:7,19,25 157:25 158:4 somebody 64:20, 21 67:15 95:21 104:24 115:5 158:6,7 someone 35:13 47:24 48:2 49:6,11 50:3 51:7 54:1 60:12 62:2 69:16 72:5 88:25 94:11 109:21 115:6,14 124:4 125:15,17 142:6	someone's 87:14 110:24 114:22,25 115:2,7,15 something 7:19 13:6 21:9 33:25 36:22 37:1 38:25 47:13 61:1 64:10 67:21 68:15 95:16 103:1 105:23 109:23 111:5,12 116:25 117:18 118:4 119:16 138:6 149:15 158:7 sometime 12:9 144:23 sometimes 25:4 26:17 30:11,12 31:18 35:8 39:6,11, 24 59:2 60:7 82:11 83:20 107:19,20 somewhere 19:2 37:15 song 64:10,11 songs 63:24 64:3, 12 soon 35:21 58:25 59:2,5,21 sorry 57:15 67:25 68:10 85:22 87:15 119:4 121:12 125:23 133:6 134:7 149:6 soul 63:21 sounds 130:1 space 63:8 spe- 117:7 speak 21:15 105:22 132:10,16	speaking 24:16 41:12 49:15 50:13 51:21 132:11,19 146:22 154:6 158:14 special 77:22 specific 29:16,18, 19 60:17 101:12 124:22 129:20 specifically 42:24 78:10 95:6 104:13 105:6 117:8 123:2 150:23 157:12 specifics 50:6 specified 36:13,15, 16,17,18 37:2,11 speculate 119:11 speech 114:10 speeding 67:16 105:1 spell 84:3 spelled 42:24 spent 37:8 50:4 split 11:1 spoke 131:21 158:4,6 spoken 40:3 sports 7:19,22 spouse's 66:8 spray 82:21 84:10, 14,20,23 89:24 spraying 84:15 squad 41:3,7,10 42:3,18 72:14 117:2 squads 41:4
--	---	--	---

141:11 151:6 staff 19:20,21 47:19 62:23 96:1 138:18 stage 103:16 Stainback 83:25 93:12 stand 57:20 standard 31:9,10 121:9 standards 34:22,23 35:14,24 56:10 59:5,7,23 78:15,20 133:14 start 6:24 22:17 134:3 started 4:25 7:23 starting 80:25 state 6:4 8:21,24 9:9 15:9,12 34:24 81:15 112:24 114:17 131:4 statement 48:13, 15,23 73:11,13,16, 22 74:1 81:7 84:17 92:10 118:14 142:11,15 143:4, 13,18,21 144:13,19 145:1 151:10 statements 145:4 151:8 156:21 157:13,17,19,23 158:1 States 73:4,6 81:15 status 114:17 115:7 statutory 147:8	stay 124:11 stayed 10:5 26:8 staying 12:14 steak 64:20 step 37:14 141:18, 19 steps 150:4 stick 29:7 still 14:2,16 15:25 26:24 74:20 98:23 111:7 stolen 25:22 stood 47:17 stop 64:18 108:19 139:6 stopped 64:17 stops 149:25 store 111:9 stored 116:22 Stovall 8:4 street 20:25 stress 33:24 stressed 17:9 strict 81:14 strictly 39:23 strikes 89:22 structure 18:10,22 20:8,11,17 21:23 23:25 24:1 26:20 structured 14:9 18:6,8 28:12,17 stuff 7:10 17:2 22:22 23:17 25:21 27:17 40:24 54:1,4	63:20 64:13 114:21 119:23 135:13 145:10 147:23 149:25 150:12 152:23 157:1,15 158:7 style 4:14 sub- 86:19 95:1 subject 89:25 90:5, 7 102:11 subjected 102:7 subjective 87:24 submission 91:24 92:16 submit 44:4 submits 95:2 submitted 34:20 44:3,14 60:3 93:5 145:9 subordinates 113:25 substances 5:25 substantial 85:24 86:20 substantiated 104:11 such 33:21 68:20 69:19 74:5 90:11 95:22 suffered 62:7 suggested 28:12 summarize 74:2 summary 98:5 superior 153:25 154:4 superiors 153:12	supervise 10:18 11:23 19:6 154:1 supervised 10:15 11:3,4,14 12:1 13:5,8 15:11,13 29:2 42:10 supervises 19:5 supervising 14:12, 25 15:8 supervision 11:5 supervision-type 26:25 supervisor 42:9,10, 11 44:1,16 45:6,7, 15 46:3,11 83:12 91:16,21,24 92:7, 10,15,17,20,25 93:23 94:1 95:3 105:20 108:25 109:8,9,11,12,16, 24 115:9 117:3 118:19 119:21,24 120:19 122:23 135:7 supervisors 10:16, 22 18:12 29:20 42:5,12 65:23 102:8,10 113:24 118:15 119:13,15 120:6,11 151:5 supervisors' 42:6 supervisory 94:16 support 16:21 supposed 13:14 42:15 sure 9:6 13:13 15:17 18:8 25:10 29:4 37:9 42:13 53:12 57:7 66:20, 21,25 78:19 92:21
---	---	--	--

93:20 123:17 127:17 135:6 141:1,20,25 142:9 148:1 152:7,12 157:11 Surenos 21:9 surfaced 157:3,4 surprised 140:17, 23 152:19,20,22 suspect 69:1 81:22 91:5 suspended 123:25 124:3,4 suspension 121:3 123:22,24 124:17, 20,23 147:1 149:24 swear 48:21 49:4, 24,25 54:19 swearing 49:16 54:9 sworn 4:3 18:3 48:19 54:23,24 55:1	67:6,19 105:1,19 108:11 144:10 talked 18:18 51:13 63:2 149:24 151:4 154:25 talking 19:23 37:20,21 45:11,18 55:23 62:8 64:4 69:1 74:18 130:17 141:12 146:24 147:21 155:21 157:12 tea 64:21 team 24:22 technically 49:22 51:14 52:15 technique 87:6,21 tell 16:16,21 23:25 38:14,24 59:12 60:13 63:16 74:2 112:13 117:12 125:18 130:21 132:8 133:12,23 134:15 144:8 146:10 telling 129:14 temperature 117:5 ten 59:8,23 61:12 122:14 ten-minute 128:22, 25 tenure 4:11 24:4 37:13 48:4 60:25 61:10 69:8 71:11 83:25 120:7,9,12, 15 153:10 158:14 term 20:5 97:23 124:22	terminate 46:24 47:7 55:25 58:22 61:14,17 62:15 131:22 terminated 46:25 47:24 48:2,10,12, 18 49:3,6,11,18 50:3,5 51:7,10 52:23 53:1,19 56:15 60:1,6,12,24 61:3,4,10,19,20 154:18,19 terminating 132:17 termination 46:20, 22 47:5 48:6 49:3, 7,22 50:7 51:14 52:14,16,21 53:1, 18,20 54:5 55:23 56:4,6 58:25 59:6, 21 60:8,16 62:10 121:4 130:2 132:3, 13 154:23 155:5 terminations 48:4 terms 20:5 69:15 73:17 74:3 130:3 testified 49:18 65:8 testifies 4:3 testify 5:23 50:10 testifying 48:1 50:20 testimony 5:8,16 6:1 141:22 tests 18:20 texts 68:9 than 6:15 14:12 36:12,13,14,18 46:25 49:14 61:12 83:21 84:14 87:21 98:11 121:22	124:7,19 132:16 153:5 154:12 thank 4:9 33:19 45:25 91:2 98:2 102:13 129:4 135:24 158:23,24 159:3 that 4:12,16,22 5:1, 21,24 6:15 7:10 8:3 9:5,15,19 10:7,14, 16,17,20 11:7,12, 17,24 12:5,14,20, 25 13:6,9,15,21 14:5,15,19,21,25 15:5,6,8,12,16,21 16:12,16,23 17:2,4, 7,9,18,21 18:12,25 19:1,3,4,6,12,18 20:16,18 21:9,12, 16,20,22 22:2,3,12, 22,25 24:11,12,20 25:1,22 26:10,19, 20 27:6,13,16,21, 22 28:8,14,16 29:1, 23 30:2,8,23 31:1,6 32:17,20,22 33:25 34:4,5,8,17,19,20, 23 35:1,10,17 37:5, 12,23 38:3,17,22 39:10 40:11,12,16, 19,24 41:12 42:13, 20,24 43:2,10,11, 12,19 44:2,13,18, 22 45:5,7,10,11,18 46:3,9,11,12,15,18, 21 47:10,11,12,13, 14,19 48:1,7,10,11, 13,15,17,23 49:2,9, 14,15,18 50:4,6,12, 13,15 51:1,10,13 53:5,12,18,19,22, 24 54:1,2,4,8 55:10,12,14,15,25 56:7,9,12,14,16,20
<hr/> T <hr/>			
table 50:21 take 18:20 23:2 37:14 55:17 60:19 66:14 87:14 99:22 114:5 122:12 127:12 128:8,10, 21,22,24,25 150:4 158:18 taken 55:20 99:25 121:1 127:18 129:1 158:21 talk 18:22 33:17 40:24 46:19 64:4			

57:2,3,5,8,18,19, 22,23 58:6,19,21 59:4,6,10,17,25 60:3,19,24 61:1,2, 3,20,21,23 62:6,10, 16,17 63:15,20 64:10,12,14,22 65:4,8,11,20,22,25 66:2,7 67:6,9,13,17 68:5,15,23 69:7,11, 20 70:5,8,13,18,20 71:10,16,18,19 72:14 73:11,13,16, 22 74:1,2,5,6,12, 17,18,19,23 75:1,5, 11,22 77:14 78:3,4, 11,20 79:4,18,25 80:3,15,16 81:6,9, 10,20,25 82:13,16, 17 83:14,15 84:1, 17,22 85:2,3,4,6,8, 17,22,23 86:2,5,21 87:13 88:24,25 89:1,3,11,19,21 90:13,25 91:4,6,10, 18 92:17,22 93:16, 17,20 94:2,3,5,6,9, 11,14 95:5,11,13, 14 96:3,24 98:19, 20 99:16,19,20 101:2,13 102:4 103:8,23 104:2,8, 12 105:4,11,20,21, 23 108:2,3,8,15 109:12,20,21,23,25 110:7,16,17,25 111:5,11,12 112:2, 14 113:18,19 114:13,19 115:4,9, 21 116:6,10,25 117:2,4,6,14,21 118:4,10,14,23,25 119:6,15 120:3,13, 16,18,25 121:9,12, 25 122:17 123:5,9,	11,17,22 124:14 125:1,18,19 126:3, 9,11,20 127:1,9 128:5 129:8,16,19 130:1 131:21,23 132:8,10,12 133:6, 16,19 134:15,23 135:4,10,14 136:2, 16,19 137:1,9,23 138:5,6,12,14 139:25 140:19 141:8,9,11,15,22 142:1,15 143:21,25 144:4,6,7,9,14,18, 21,22,25 145:11,13 146:4,10,13,25 147:1,6,15,17,18, 19,20,22 148:1,11, 20 149:13,20,21,25 150:12,13 151:3,5, 6,12,13,16,19,20 152:8,10,11,12,15, 23,24,25 154:2,12 155:1,7,11,19 156:1,7,9,19,22,23, 25 157:1,3,4,6,22, 24 158:5,7 that's 19:13 23:3 27:12 28:3,18 34:24 37:7,21 41:11 44:3 45:11 51:21 54:13 62:12 68:18 69:7 74:6 78:24 82:22 83:7 86:13 107:3 108:24 116:19 117:14 123:15,18 128:14 129:4 134:13 136:3 139:22 150:13 151:25 152:2 the 4:15 5:1,2,4,6, 12,19 6:5,11,15,16, 18 7:1,4,16,22 8:9, 21 9:2,7,9,12,20,23	10:5,13,15,16,25 11:1,2,3,4,12,14, 21,22,23 12:2,3,23, 24 13:18 14:1,2,8, 9,10,12,13,15,21, 24 15:6,9,11,12,13, 20,25 16:7,8,9,22, 23,25 17:4,9,13,14, 19,20,21,23 18:6, 22 19:2,5,6,7,9,12, 15,25 20:3,8,11,15, 16,17,19,25 21:2,3, 6,7,8,13,21,23,24 22:3,8,21,25 23:18, 25 24:2,3,6,10,11, 13,17,18,20,21,25 25:6,9,12,13,14,17, 18,19,25 26:1,3,4, 5,7,8,9,12,13,15, 18,22,23,24,25 27:4,5,10,13,14,16, 19,21,23,24 28:9, 12,14,15,18,25 29:2,5,10,13,16,22 30:4,6,19,20,24,25 31:3,4,6,12,17,19, 22,23,24,25 32:1,2, 6,11,14,18,20 33:1, 7,11,15,24,25 34:17,24 35:4,6,9, 11,17,23 36:1,3,4, 9,10,11,13,15,18, 21 37:2,8,10,15,17, 19,22 38:3,4,7,9, 12,16,21,22 39:4,7, 20,23,24 40:1,3,9, 17,18,20,21,23,24, 25 41:2,8,11,13,17, 22 42:6,9,10,11,12, 16,19,21 43:1,3,4, 6,17,23 44:5,8,11, 12,16,18 45:2,3,7, 8,11,12,13,15,16, 17 46:2,4,10,14,15, 19,20 47:4,8,17	48:5,13,16,19,25 49:6,14,25 50:6,11, 21,24 51:1,13,15, 25 52:5,9,17,18 53:2,3,10,11,15,16, 17,20,21,25 54:2,4, 5,8,9,22,25 55:7,23 56:4,6,11,12,13,14, 19,20,23 57:5,8,9, 14,20,22,25 58:1,2, 6,9,11,13,15,19 59:2,3,10,17,25 60:4,23 61:24,25 62:4,10,12,14,21, 22,23 63:4,6,7,12, 13,14,16,18,23 64:5,6,7,8,11,15,25 65:4,5,6,9,15,16, 18,20 66:4,17,20, 22 67:7,11,13,19, 22,23,25 68:6,9,14 69:7,8,12,22 70:9, 11,17,25 71:3,6,12 72:11,13,18,23,25 73:2,3,4,5,6,7,8,9, 18,23 74:13,16,18, 22,24,25 75:3,5,6, 8,15,20,25 76:4,11, 15,16 77:2,5,9,11, 13,16,18,19,20,22 78:10,13,14,15,20, 22,23 79:4,24 80:4, 8,9,12,15,18,19,25 81:1,2,3,8,12,15 82:17,19,21 83:2,7, 23,25 84:5,8,9,13, 19,20,22,24 85:1,6, 7,13,14,20,23 86:4, 8,12,14,18 87:2,5, 7,15,16,17,19,22 88:8,10,13,14,16, 19,20,21 89:7,14, 20 90:1,2,4,7,8,10, 17,20,23 91:1,2,3, 4,6,8,9,21,22,23,24
---	--	--	---

92:1,2,3,4,5,6,7,8, 9,10,11,15,17,18, 20,22,23,25 93:1,2, 3,4,5,7,11,14,18, 20,22,25 94:2,4,5, 6,7,8,9,10,12,17, 18,20,21,22,23,24, 25 95:1,2,3,4,5,9, 18,20,24,25 96:1,3, 14,19,20,22,25 97:1,3,5,7,8,10,12, 13,20,24 98:1,14, 17,18,19,21,23 99:1,4,5,7,8,20 100:6,9,14,19,22, 24,25 101:5,8,11, 12,15,20,23,25 102:3,6,9,22,25 103:11,17,19,23,24 104:5,6,8,9,10,16, 19,20,25 105:11, 19,20,21,24 106:1, 3,4,7,12,18,20 107:1,6,7,12,20,22, 23,25 108:15,17, 20,21,23,24,25 109:2,5,6,8,9,11, 14,16,17,18,23,25 110:1,4,5,8,13,21, 23 111:4,9,15,17, 20,21,23,25 112:1, 2,4,5,12,14,19,21, 24,25 113:9,12,15, 17,19,20,21,22,23 114:2,7,20 115:8, 13,16,24 116:21, 22,24,25 117:2,3,4, 5,11,16 118:2,18 119:21,24,25 120:6,8,10,11,14, 22 121:1,7,16,20 122:4,8,9,13,15,17, 20,22,23 123:8,10, 15,17,19,21 124:1, 2,5,6,7,10,11,13,	19,21,23 125:3,21 126:3,7,13,14,15, 19,22,24 127:1,4,7, 20,21 128:6,13 129:9,11,12,20,22, 24 130:3,15,22,23, 24 131:4,8,12,13, 14,15 132:7,13,20 133:3,4,7,10,16,17, 19,23 134:3,17,18, 21 135:3,4,5,11,14, 20 136:2,3,16,19, 22,23 137:18 138:5,7,8,10,12,15, 18,23 139:2,6,8,9, 10,11,13 140:2,4, 11,14,17,25 141:8, 9,10,12,13,14,15, 23 142:2,25 143:13,15,18,23 144:2,10,11,25 145:3,5,6,19,21,23 146:10,12,17,24 147:7,11,13,20,23, 25 148:2,8,13,17 149:3,5,7,23 150:1, 2,6,12,14,18,21 151:2,4,7,11,16,17, 19,20,22 152:3,5, 12,23 153:2,5,6,7, 13,17,19,21,23 154:3,5,8,10,12,15, 18 155:4,7,8,10,12, 15,18,20,23,24 156:3,7,17 157:10 158:4,14 159:2 their 13:11 17:10 21:5,17 22:14,20 24:3,5 25:17 26:10, 16 32:17 34:2,18 35:19,24 37:24 38:14 39:19 40:21, 23 41:9 42:2,5,11, 13,18,25 43:1,25	45:6 46:7,11 53:23, 24 60:14 63:3 73:5 102:5,9 121:8 124:2,5 139:7 them 13:12 16:21 17:4 20:25 22:4 23:2,6 24:8,9,14 26:15 31:7,20 32:24 33:8,13,17, 18,19,20 34:4,11, 12 35:18,20,24 37:22,24 38:3 39:3 42:5,11 46:17 51:24 53:24 60:13 61:13 65:12 70:24 73:5 82:8 93:13 95:5 108:16,18,19 120:18 121:17,19 124:7 135:23 139:12 147:23 themselves 21:15 24:6 63:10 89:7 then 6:25 7:6,24 8:8,20 9:24,25 10:18,20,24 11:19 14:17 15:19 16:3, 19 18:4,7 19:4,5,6, 14,17 21:19 24:9, 11 25:4 30:4 31:5 32:9,18 33:8 34:17 35:18,20,22 39:12 42:7 44:4 45:3 46:18 53:18 54:3 63:3 67:21 68:16 84:1 88:13 92:25 95:14 104:3 111:11,17,20 115:9 116:23 123:21 124:25 127:20 128:3,12,13 130:2 150:9 151:12 152:3 158:5 therapeutic 7:17	therapy 7:18 there 4:12,17 6:24 8:6,7,12,14,15,18, 23,25 9:1 10:1,2,6, 8,11,22,23 11:16, 20 12:15 13:1 14:4, 11 15:7 16:5 18:9, 15 21:8,19 22:12, 18 27:1 28:20 29:3, 4,7 31:10,11,22 32:12 37:25 38:8 39:21 41:21 42:20, 22 43:16 44:25 45:1 46:3,6 47:5,11 48:9,10,11,19 50:5, 7,21,23 52:15 55:24 65:20 67:20 70:4 71:10,16 72:13 74:15 82:2 83:24 91:9 93:10, 15 95:13,23 98:8 100:5 103:17 114:20 115:23 121:25 138:14 141:2 142:2 144:14 145:17 147:15,21 149:14 151:24 156:8 158:10 there's 24:25 46:22 52:19,21 56:7,9 82:2 83:11 117:2 122:18 124:18,21 127:21 148:11 149:7,21 thereafter 16:12 Therefore 81:8 these 19:25 27:5 28:11 29:5 37:23 39:3 59:25 60:2,3 66:11 70:23 71:1 75:19 76:20 83:13 116:4 118:17 139:6,15,16 140:15
--	--	---	--

157:9,14 they 13:10,13,14 17:5 20:23 21:9,14, 15,17,18,21 22:6, 20,22,23 24:4,6 25:14,19 26:8,9,10, 16 29:6,8,9,12,16, 18,19 30:24 31:4,6, 7,11,14,18 32:4,6, 15,16,17,19 33:7 34:17,21 35:7,8,19, 21 36:6,7 40:13,22, 23 41:6,15,17,18, 23 42:2,4,6,10,12, 13,14,18,25 43:25 44:8,17 45:2,4,8,23 46:2,10,11,12,17 53:8,24 54:3 56:14 60:12 61:4 62:7 63:4 65:25 66:2,6,7 72:11,12,14,15 75:13,14 82:13 83:2,4,5,14 85:2 86:13,16 88:25 89:6 93:15 94:7 95:4,5 98:20 104:25 105:22,23 106:8 107:19,20 108:15,16,17,19 111:23 114:1 117:23,25 121:17, 18 122:3,4 123:6, 19,20 124:1 138:19 145:14 146:16,17, 20 148:16 154:13 157:19,22 they're 33:23 35:19,22 39:2 41:2 53:1 57:11 83:20 89:2,3,5,7,8 91:2 121:23 they've 22:19 39:1, 2 52:24 123:5	thing 16:25 35:11 63:19 65:25 66:7 73:18 90:13 102:22 103:9 105:4 112:15 115:22 120:18 130:22,24 141:11 things 4:16 22:12, 24 33:21 40:21 55:24 102:16 121:18 122:4 142:3 146:21 149:19 151:24 think 11:17 13:23 15:8 27:12 34:9 35:11 42:23 44:10 49:5 51:21 66:13 69:21 70:5 82:22 93:11,13 96:19 105:2 119:7,10 151:17 155:2 158:19 thinking 12:21 78:19 101:2 149:15 third 41:14 94:12, 14 138:10 139:9 this 4:19 5:8 8:4 17:5 30:22 32:10 34:4 38:4 40:8 44:20,22 49:21 50:16 51:19 52:3 56:23 57:8,23 58:9, 16,19 59:1,9,12,14, 22 62:12 69:21 70:2 71:6,11,25 75:11,14,16,19 76:3,9,13,20,23,25 77:8,15 78:13 79:12,15,20,22 80:2,20,22 81:16 83:13 86:18,21 87:11,24 89:9,11 90:25 91:15,25 92:5,13,17,20 96:6	99:6,18 100:12,16, 21 101:3,5,10,13, 15,17,20 102:3,11 106:23 107:4,10, 12,14,18 108:1 112:7,9,25 113:3,5, 7,9,13 114:21 116:11,12,13 117:7 118:6,10 119:23 125:5,9,10 128:5,6 130:6,7,12 131:1 132:17,20 133:12, 20,23 135:9,13 136:2,6,8,12,19 137:2,22,24 138:1, 3,5 139:17,20 140:7,16 141:1,7,8, 10 142:19,21,24 143:1,3,6,7,9,13 144:2,17,24 145:10,25 146:6, 13,14,23 147:13,20 148:2,13,25 149:3, 6,10,12,16,20,23 150:4,8,10,11,13 151:2,6,17,21 152:12,13,24 153:16 156:3 157:2,10,14 158:4, 7,22,24 tho- 116:4 Thomas 17:17 thoroughly 32:19 114:3 those 12:2 31:13 40:5 51:19 65:2,3,9 68:25 69:17 70:20 89:25 90:14 108:8, 11,12 120:4 137:12 141:16 157:17,19, 22 158:1 though 20:23 33:19	thought 21:20 53:13 65:9,11,12 100:22 104:15 135:22 155:2 threatening 21:21 three 7:9 8:15 10:23 12:3 15:5 30:15,16 32:13 39:19 96:19,21 97:11 99:2 138:17 154:14 three-page 130:19 threshold 39:21 through 24:9 27:22 30:3 31:4,20 44:5, 18,21 69:4 73:4 76:5 85:12 97:8 111:15,23 135:11 158:24 ticket 129:18,22 time 6:15,16 10:6, 17 11:24 12:5 17:14 22:9 24:10 29:3,11 30:19,20, 25 37:8,17 44:21 46:10 50:9 54:1 63:15 68:24 86:8, 20 90:12 94:10 95:23 96:19 100:9 112:12,21 120:7,8, 12,15 122:18 127:20 128:5,7,13 129:8 132:7 136:19 139:9 145:5,6 151:23 154:14 155:8,10 158:23 timeline 72:4 times 25:3,20 27:18,20 60:9 62:20 82:12 96:18
--	--	--	--

<p>tires 14:22 139:1,5, 11,12,13 141:13</p> <p>title 8:11,23 28:22 136:23 137:7,18 147:11,13,23</p> <p>to 4:10,17,25 5:3,4, 8,13,23 6:1,18,21, 25 7:1,8,12 9:2,7, 12,20,21 10:11 11:12,13,22 12:8, 12,14,17,19,23,24 13:12,14,18 14:1,5, 15,16,18 15:20 16:8,11,20 17:23 18:12,13,19,20,24 19:11,13 20:18 21:9,11,12,15,23 22:6,19 23:1,2,4,15 24:10,12,19 25:15, 20,23 26:5,16,17, 23 27:18,19 28:14 29:10,11,22 30:4,8 31:8,20 32:10,11, 22 33:4,5,10,11,12, 17,19,21,23 34:12, 21 35:6,14,21,23 36:7,11,23 37:4,6, 11,23 38:4,22 40:2, 5,7,8,24 41:2,6,19, 24 42:2,4,15,19,25 43:19 44:3,4,5,6, 14,19,20 45:23 46:4,13,15,17,18, 20,24 47:7,11 48:12,15,16,17,21, 25 49:20 50:7,10, 14,21 52:5,9,13,22 53:13 54:3,8,21 55:1,24 56:3,7,9, 11,12,23 57:3,7,16, 21 58:4 59:5 60:5 61:1,6 62:14,18,24 63:1,15 65:2,13,20, 22,24,25 66:9,10,</p>	<p>11,12,14,17,20 67:9,14,16,19 69:5, 20,21 70:3,8,15 71:3 72:1,5,13,15, 16,20,22,23 73:13, 14,19,20,22 74:10 75:6,8,15,19,20 76:3,5,6,11 77:2, 18,22,23 78:2,3,13, 17,25 79:3,8,12,22, 24 80:6 81:3,10 82:10,12,14,16,20 83:18 84:1,9,12,22 85:17,25 86:14,16, 17,25 87:5,7,11 88:1,11,22 89:2,4, 5,6,7,9,25 90:10 91:9,11,23 92:1,14, 16,18,21 93:3,5,25 94:12,22,23 95:2,3, 13,16,21,23,24 96:3,25 97:22 98:17,19 99:6,9,11, 16,18 100:9 101:5, 25 102:3,4,5,7,11, 12,18 103:7,12,14, 18,24 104:3,5,6,12 105:18,21,22 106:4,5,6,8,9,14,18 107:6,17 108:5,6,8, 10,15,17,19,24 109:4,10,16,21,24 110:13,14,17,19,23 111:7,18,20,22 112:5,7,8,13,14,16, 17,21 113:21 114:6 115:8,10,13 116:13,17,18,22 117:14,23,25 118:10,11,18 119:9,11,19,21,25 121:4,8,17,19 122:8 123:4,6,7,16, 17,19,20 124:1,7, 10,14,25 125:1,2,7,</p>	<p>10 126:7,8,10,12, 13 127:9,20,21,22, 24 128:10,16,21 129:7,8,9,11,17,24 130:21 131:14,21, 22 132:2,6,10,11, 16,17,19 133:3,13, 14,15 134:5,17,21 135:4,5,6,7,14,15, 21 137:3 138:4,8, 20,21 139:1,6,7,10, 12,14,22 140:14 141:2,10,16 142:12,14 143:17, 18 144:3,9,17,23 145:3,4,7,8,10,12, 15,19 146:2,14 147:21,22 148:10, 11 150:3,11 151:10,12 152:5, 10,11,13,17 153:9, 14 154:3,7,20 155:7,8,12,14 156:6,9 157:5,7,17 158:4,6,7,8,9,12, 13,23</p> <p>to-the-point 90:3</p> <p>today 5:23 6:2 58:7</p> <p>together 17:10 31:11 35:7,8 45:9 63:2 66:6 70:6 141:3 148:16 149:19 151:25 158:8</p> <p>told 4:13 17:4 139:5 144:8</p> <p>tolerance 114:20 115:12 116:8,10</p> <p>tolerated 114:18 116:12</p> <p>tone 115:4</p>	<p>too 8:4 103:2,3 117:3</p> <p>took 8:9 14:1 35:7 50:1 90:11 156:7</p> <p>top 107:7</p> <p>toward 103:8</p> <p>tracking 26:15</p> <p>traffic 149:24</p> <p>train 83:3</p> <p>trained 39:3 83:2,4, 5 84:20</p> <p>trainee 36:10 40:21</p> <p>training 21:25 22:7 27:20 34:22,23 35:14 36:1,3,7 39:4,11,14,16,17, 19,22 40:18,20 41:1 56:10 59:5 83:6 84:11,14,23, 25 85:1,3,4,7,14 88:22 92:4 94:15 95:11,14,15 97:15, 16 133:4,8,17 151:5,14,17</p> <p>transcript 52:1</p> <p>transfer 11:20 12:19 14:1 121:3 124:25</p> <p>transferred 10:11 11:13 125:2</p> <p>transporting 9:9</p> <p>treat 33:21 78:13</p> <p>treated 69:12</p> <p>treating 16:25</p> <p>treatment 89:1 156:17</p>
---	--	--	---

tried 13:12 95:21, 24 trooper 8:24 troopers 10:16,19 11:4,14,23 12:2 try 46:13 65:24 105:21 115:10 123:16 trying 16:20 24:19 40:5,7 49:19 50:14 121:19 123:17 139:22 turn 72:22 73:19 74:9 75:8,20 77:18 78:2 85:17 86:25 89:9 91:11 96:3 112:7 155:12,14 two 7:5,7,9,14 12:21 25:3,5 30:15 32:2,12 38:9 39:18 41:17 60:2,4 83:24 88:19 96:21 97:1, 18 101:24 135:20 145:18 147:22 149:13,14 151:25 type 5:5 20:22,24 22:22 23:10,17 40:24 42:20,22,23 53:16 54:1 63:24 64:3,12 65:25 66:7 67:8 68:14 77:15 85:2 88:14 90:13 103:8,9 104:16,20, 21 105:4 108:13 111:4 112:2 114:21 115:4,16,21 116:12 119:23,24 120:18 141:11,16 148:12 157:1 types 65:1,3 81:25 83:10 116:4	typical 143:21,23 typically 35:14 40:25 46:4,5 54:6 121:2 122:11 <hr/> U <hr/> uh-huh 5:20 7:15 8:17 18:14 21:6 22:5 23:5 24:18 28:20 30:21 32:4,8 33:22 34:3,15 36:1 40:15 41:16 44:24 52:20 56:8 122:20 ultimate 146:12 ultimately 24:20 under 6:2 18:23 20:3 21:12 26:24 27:5 28:8,9 37:12, 13 54:25 55:1 75:16 78:16 81:11 83:24 87:7,23 96:7, 11 97:3 102:9 113:19 153:10 understand 98:16 128:5 143:2 144:17 understanding 50:14 84:13 115:17,19 understands 123:18 unfounded 146:16 uniforms 14:24 124:7 unit 15:11,13,14 25:12 26:7 27:7 28:25 29:2 United 73:4,6 81:15 units 15:14	unlawful 113:1,19, 22 114:8,9 unless 54:23 84:20 143:23 unsolicited 114:10 until 8:18 9:1 16:5 20:9 44:8 108:25 109:13 129:7 138:25 up 12:7 24:13 27:1, 22 44:17 48:20 52:17 54:21 57:20 65:22 66:12,14 69:24 70:4 86:14, 16 102:12 108:25 109:13 111:11,24 112:13 114:6 120:19 122:23 130:10,17,20,21 133:4 134:5,6 135:17 137:13 142:16 145:21 154:22 156:1 update 71:8,10,17, 19 72:1 80:16,18 107:10 113:12 updated 77:8,9,11 80:2,4,8,15,18,21 101:10,13,14 113:14 updating 72:4,6 uphold 75:6 upholding 73:5 upon 93:6 138:16 us 4:15 11:2 21:14 63:14 136:11 use 61:24,25 79:16 81:3,9,13 82:14,16, 20 83:2 84:11,14, 21 87:13 89:15,16,	20 90:4,9,11,17,24 91:22 92:4,5,8 93:1,3,4,7,18,21 94:4,8,10,17,22,23 95:1,4,10 96:22 97:5,7,9 98:4,14,23 99:3,5,20 110:21, 23 126:12 130:11 131:9,10 152:3 155:8,9,12,15,23 used 5:25 14:21,24 26:13,16 58:7 81:18 82:1,2,3 84:8 90:10,12 92:19 uses 89:23 using 78:14 81:22 89:22 131:15 146:24 utilizing 102:6 <hr/> V <hr/> vacancies 41:8 120:17 vacancy 11:21 Vance 6:21,23,25 7:8 10:11 11:25 12:1,4,6,7,20 16:11,13 19:9 20:1, 20 21:25 24:1 25:9 35:5 36:5 37:20 38:6 40:12 50:11 72:19 76:11,18 77:20 79:16 80:19 81:8 84:9 85:5,8,9 96:14 100:14 106:23 113:4,17 114:21 Vance-granville 7:13 variance 37:25
---	---	--	---

varied 30:13 32:14 36:9 96:18 120:17	Waiver 133:5,8,17	16:7,16,24 17:4,15, 16,17,21 18:6,8 19:11,13 20:10,15, 16,18 21:2,8,20 22:24 24:17,21 25:1,2,3,6 26:10 27:10,21 28:6,11, 17 29:2 30:1,14,22, 23 31:1,10,11,22 32:2,12 33:10,12, 25 35:4,6,11 36:1, 4,17 37:2,3,12,15, 17,18,25 38:6,9 39:21 40:7,16 41:5, 14,20 42:20,22,25 43:12,14,16,17,20 44:22,25 45:1,6,7, 10,15,19,20 46:3,6, 9 47:5,13 48:11,17, 24 49:2,15 50:15, 23 51:10,14,15 54:11,13,14,15,16, 23,24,25 55:6 56:21 57:18,22,24 59:19 61:2,3,19,20, 22,23,24 62:2,4,6, 10,25 63:16,22 64:22 65:4,12,14, 20,22 67:16,20,21 68:5,25 71:10,11, 14,16,22 72:5,13 77:14 79:6 80:15, 17,21,22,24 83:22, 25 89:12 90:12 92:19,22 93:10,11, 13,15,17 94:6,24 95:11,12,13,23 96:1,19 97:20,21, 22,24 100:19 101:1,18 103:14, 17,18 104:2,4,5,6, 13 105:3,11,21,22, 23 106:3,11 112:11 113:13 115:20 116:11 117:19	120:10 125:19,20, 21 126:3,4,9,11,13, 17,24 127:3,4 129:15 130:12,20 131:13,16,19 132:13,20,25 133:1,6,21 134:3, 23 135:13,14,25 136:14,19 137:6,11 138:17 139:7,8,25 140:18,19 141:9,20 142:9,22,25 143:11,16 144:2,7 145:1 146:8,12,23 147:1,3,11,13,15 148:5,13,15 149:12 150:8,9,10 151:3,5, 6,12,13,24 152:15, 18,19,25 155:2,7 157:2,6 158:5 wasn't 20:11 28:4, 20 29:12 48:18,19 49:21,22 69:12 116:9 Watkins 93:13 143:17 144:20 151:14 way 13:7,12 28:12 40:23 44:18 48:19 63:3 69:8 78:14 86:19 111:11 117:5 123:9,11 Wayne 151:15 we 4:24 5:1,2 11:4 12:1 13:10,13 15:6, 11,13 17:9 18:17 19:4,5 20:14,15 21:2,4,20 22:4,17, 18 23:12 24:12,13, 15,16 25:11 28:4,5 30:7,8,11,12,15 32:10 33:19 35:9, 16,17,18,20,21,22
various 31:20 43:2	walk 24:2 44:21 70:3		
vary 122:16	walked 139:9		
vehicle 34:4,10 124:5 139:1	walkway 38:9		
verification 84:25 85:1,4	want 4:25 5:13 14:5 16:8 19:11 21:11 23:1 37:3,6,23 48:12 51:1 57:7 61:5 66:11,19 67:16 69:21 72:22 76:5,6 109:18 112:8,16 119:9,11 129:8 130:21 134:5 135:20 142:14 156:6,8 158:23		
verify 38:15	wanted 12:12 22:18 46:24 64:20,21 72:15		
versus 17:3 42:21	warning 121:3,6,7, 22		
very 4:12,13,14 20:18 39:20 68:8 94:9 98:8,9 122:7	warrant 104:23 105:4		
vest 138:17,21,22	warranted 47:5 104:17		
vesting 81:2	warrantless 78:16		
vests 110:5,9,11,14	warrants 53:1 68:15		
via 145:16	Warren 12:1		
video 91:25 97:6	was 6:15 7:7,10 8:1,3,4,7,11,13,15, 18,23 9:1,2,20,21, 25 10:6,8,15,19,20, 23 11:5,9,12,13,17, 21,22,24 12:6,13, 16,23 13:1,4,23 14:5,8,12,15,16,20 15:4,5,6,20,24		
videos 93:2			
VII 136:23 137:7,18 147:11,14,23			
violate 102:11			
violation 95:17 109:23			
violations 109:17			
violence 77:23			
visible 90:6			
visit 35:8 66:6			
<hr/> W <hr/>			
wa- 54:13			
wait 52:1			
waiting 35:23			

37:24 38:2,8 39:3 45:5 47:11 49:15 50:10 51:13,15 53:5,24,25 54:3 55:17,22 56:20 57:18,23 58:2,5 59:2,10,18 60:7,9, 13 62:21,22 63:2,6, 8,9,14 64:16,19,20, 21,23,24 65:13 66:9,10,12 67:5,18, 19,23 68:9 69:6,19, 21 72:19 75:24 78:1 82:10,11,12, 17 93:21 96:25 98:9,23 99:22 101:1 108:14,15, 16,18,19 120:17,18 124:4,5,6,13 127:12,20 128:2,4, 18,20 129:6,7 130:12 135:22 143:7 148:20 151:20 154:25 155:2,21 158:14 we'll 75:19 76:5 128:24 142:14 we're 11:10 44:10 45:18 69:1 71:13 74:20 104:12 112:7 127:20,23,24 128:6,9,10,15,16 133:2 141:12 154:6 157:12 we've 25:10 68:23 69:8,19 130:7 weapon 54:1 87:6, 21 89:24 90:1 week 36:25 86:9 weeks 36:8,9 37:3, 4,6 40:9 138:17 139:2	welcome 33:18 34:11 46:1 Weldon 68:4,6,16 98:1 99:16 127:9 131:21 132:16,23 welfare 81:3 well 7:20 10:2,4 11:2 12:6,13,18 13:10 14:20 15:9 16:18 17:24 18:11 19:14,15 21:14,17 22:12 23:12,15 28:4 29:12 30:19 32:14 33:12 36:6, 10,20 37:18 38:2 39:6,10,13,18,20 46:22 47:4 48:17 49:17,21 50:2 52:15,20,22,24 53:11 54:13 56:7 58:3,17 60:23 63:12,13 64:19 65:16,22 66:18 69:10 85:11 86:21 87:25 94:9 95:21 96:18 99:13 101:16 102:15 105:20 110:16 116:9 121:23 123:11 125:16 128:2,3,6,8, 12,15,18,20 130:16 141:13 143:23 144:1,10 147:13 148:13,16 150:1 152:18 153:4 155:25 went 4:16 5:2 6:25 7:1 12:8 32:7 42:4 63:3 64:15 80:10 84:1 139:10 145:18 150:11 were 4:17 7:4,24 8:6,11,14,25 9:13,	23 10:7,16,22 11:2, 7,16 12:20,25 13:3, 10,13,14,21 14:4, 10,11,25 15:7,16, 25 16:3 17:9 18:3, 15 19:25 20:20,23, 25 21:1,6,9,11,12 22:3,6,12,23 23:10, 12 24:7,12,20 26:13,16 29:5,8 30:2 31:11,13,14, 18 32:19,22 33:19 35:19,21,23 36:7, 13,17 38:6,8 40:5, 22,23 41:6,8,21,22, 23 42:2,6,12,15,18, 19 43:2,4,8 45:2,4 46:2 48:10 50:5,7 53:5,12 55:8,22 56:15 61:4 63:4 65:7,24 67:6 68:25 70:25 71:16 72:11 83:22,24 93:15,25 95:7 96:25 98:8 104:10 106:3 126:15 129:14 131:8 132:5 138:19 139:13 140:17,21 141:2 142:2 143:24 144:3 145:11,13, 14,17 146:16 147:22 151:16 152:16,20,22 154:13 156:8,9,13 158:10 weren't 9:23 21:1, 21 44:8 127:7 what 4:25 7:1,6,15 8:3,11,20,23 9:5,17 10:10 11:10,19 12:22 13:3,8,9,10, 13,25 14:14,16,19 15:6,11,19,22 16:10,14,16,21,24	17:3,25 19:13,18 20:13,22,24 21:2,3, 6,16 22:8,10,15,19 23:10,14,18 24:19, 21 25:11,13,18 26:19 27:14 28:8 30:14 31:2,13,14 32:5 33:14,15 34:7, 16 35:4,14 36:1,4, 24 37:2,21,24 38:2, 4,21,23 39:3 40:13, 17,19,25 41:20,22, 25 42:3,11,14 43:23 44:2,7 45:16 46:9,13,21 47:3,15 49:12 50:24 52:24 53:2,10,14,22 54:13,14 55:7 56:3 57:16 58:15 59:12, 18 60:3 61:20,23 62:14 63:11,24 64:3 65:1 66:2,24 68:5,14,18 69:15 73:13,14 74:2 75:1 76:13,16 78:17,24 80:12 82:19 85:1 86:7,18 87:9,11 90:9,11,12 92:13 94:24 95:6,7 96:10 97:24 98:16 99:14, 18 100:19 102:14 103:16 104:21 106:23 108:2,13,18 109:20 110:10,20, 23 111:2,7 114:19 115:6,13,18 117:12,16 118:22, 24 119:12,13 120:8,10 121:6,11, 15,17 123:13,17, 18,22 125:1,21 126:3,5,7,13,24 129:3,4 130:12,16, 20 131:4,25 132:4, 6 133:6,12 134:3,
--	--	---	---

12,15 139:8,14,22 140:9,19 141:5,15, 16,18 142:24,25 143:1,3 145:19 146:12 147:11 149:10,15 150:3,4, 8,10,17,21,23 151:23 155:14,21 156:23 157:4 158:3 what's 67:25 90:20 103:6 115:10 116:17 122:17 124:2,20,23 147:7 whatever 14:23 18:12 42:5 44:17 53:12 63:3 72:15 83:15 154:20 when 4:16 5:2 9:7 10:2 13:8 16:6 18:3,15 19:14,18 22:4,10,11 24:16 28:24 33:14 35:16 36:6 38:23 40:17 43:12 44:22 45:10 47:23 48:19 50:1,2 51:2,6,25 55:25 58:23 60:1,15 66:14 70:8 71:19, 22 76:3 79:11 80:18 87:4 88:25 89:6 93:10 95:4,8 99:11 103:17 111:2,14 123:25 124:2 135:3,12 137:6 139:16 140:6 145:7,9 146:24 149:10,24 150:4, 11,21 153:25 154:18 156:4,8 157:5 158:13 whenever 58:21 66:21 72:14 90:5	where 9:19 12:13 22:19 26:19 41:8 49:5 74:24 75:2 85:20 88:4 89:8,14, 25 90:7 93:22 114:7 118:19 148:4 152:25 where'd 8:8,20 where's 139:10 wherever 54:3 whether 22:23 57:10 67:12 92:2, 18 103:20 129:16 135:6 which 8:4 11:14 15:14 16:11 19:16 22:8 33:3 39:17 45:3 46:6 49:20 51:13,17,23 56:5, 11,20 62:18 69:11 71:13 73:15 78:5 80:23 81:10 84:11 87:6,20,21 97:22 115:14 120:2 125:15,17 129:15 132:2 137:6 145:18 151:23 154:13 156:13 whichever 152:15 while 35:18,22 64:15 81:11,22 138:19 white 4:2,6,20,21 5:9 6:6 47:1 50:9 51:25 52:13 54:10, 12,15,16 55:22 56:24 59:10 61:5 62:8 66:13,15 67:5 68:13 69:1 70:2,7, 14 71:9 75:9 76:2, 10 79:15 84:6	85:18 87:9 89:15 92:24 96:6 98:6,22 100:2,10,13 106:17 112:13,22 117:7 118:14 126:4 127:3 129:10,14 131:2,7, 22 132:10,17 133:15,16,24 134:10,16,24,25 135:6 137:2,4,17 139:21 142:12 143:5,19 144:7,8, 16,18 145:8 146:1, 3,25 147:18,19 148:4,7 152:10 153:2 154:9,16,19 156:6,10,16,18 157:24 158:23 White's 4:17 120:7, 12,15 130:11 131:9 134:1,6 135:18 136:20 145:12 152:17 155:8 156:13,21 who 17:12,14,16 19:25 24:15,22 31:23 32:11 37:10 39:24 42:16 48:15 60:5 64:4 67:19 72:5 77:11,13 82:9, 12 83:22 92:10 93:7,9,17 94:8 95:18 96:11 97:13, 20,24 99:7,11 100:25 102:10 109:5 111:21 118:16 119:13 122:20 127:6 134:23 138:3,4 146:20 147:18 151:10 153:7,21,23 154:5 whoever 31:25 107:21 111:6	116:21 122:9 123:15 145:8 whole 10:13 22:24 24:17 28:19 64:11 73:8 81:6 112:14 whom 80:6 114:1 116:20 whose 113:3 why 16:21 17:7 39:16 60:10,13 61:4 64:18 67:16 72:17 78:23 90:13 104:25 116:7 152:22 will 4:20,22 18:24 34:5 38:3 54:2 58:6,7 68:17 70:7 73:8 74:1,9,22,24 75:2 76:2 77:18 78:2 79:11,14 83:12 84:11 87:6, 21,22 94:10 96:3 97:6 99:6,8 101:20, 23 102:5 107:23 108:15 114:3,5,17 123:16 134:19 138:8,12 wing 27:2 wires 139:13 with 5:5,19 9:10,12, 23 10:25 13:12 15:7 16:23 17:21 20:17 21:17 23:13 27:22,24 28:22 29:24 30:25 31:23, 24 32:4,10 33:1,8, 13,14 34:1 36:25 37:7,8 38:15 39:18, 19,24 40:1,3,9,22 44:16,18 45:8,24 46:12,16 50:3
---	---	---	---

51:23 57:12 63:18 65:15,21 72:9,11, 17 73:11,12 74:25 75:3 78:12 80:11 81:14 82:15 88:17 89:22 90:7,21 91:23 92:1,6 93:2 94:20 95:8 97:12 105:19 109:6 111:24 112:17 114:1 121:16 124:11,14 125:12 128:13 131:1 132:23 133:17 145:19 146:22,25 147:24 148:4,7 149:15,20 151:5 153:1,5 within 29:10 54:2 59:23 65:4 88:21 99:4 107:25 without 47:24 48:2 49:8,13,19 51:16 84:23,24 123:25 WITNESS 57:20 58:9 66:17,22 68:6 75:25 85:23 91:21 98:1 100:6 106:12 112:19 129:12 133:10 140:2,4,11 145:23 156:3 159:2 witnesses 151:1 woman 69:11 96:22 woman's 129:17,25 women 96:7,9,11, 16 won 17:18,19,20 18:1,2 wondering 104:25 word 110:4 132:1	146:24 words 69:18 96:1 114:14 work 7:21 22:2 36:25 41:25 42:4 48:12 54:22 68:21 77:15 113:21 114:13 121:3 123:22,24,25 worked 7:9 12:2 15:12 35:7 41:17, 18 49:25 working 26:4 35:19,22 103:2,3 workplace 13:16 67:9 68:19 69:14 105:8,9,10,14,17 110:1 113:1,20,22 114:8,9 117:8,11, 17 136:25 works 76:7 would 6:18 12:16 16:12 17:5 18:12, 19 21:19 22:14,17, 18 23:18 24:7,9,10, 11,13 25:20,22 26:11,19,21,23 27:4,17,18,20,22 28:8 30:2,3,4,11, 17,21,24 31:2,3,4, 6,7,19,22,23 32:2, 4,6,9 33:8,14,15, 17,24 34:4,11,16, 17,19,21 35:1,3,9, 10,17,18,20,22 36:23,24 37:22 38:2,3,15,21,24 39:24 40:1,2 41:9 42:16,17 43:23,24, 25 44:2,4,5,7,12 45:4,7,8 46:12,14, 18,21 47:12,14,15	50:17 53:7,8,10,13, 14,15,17,18,20,24, 25 54:3,5 60:4,10 61:1,12 62:21,22 63:6,8,12,14,18,19, 24 64:3,4,9,10,11, 12 65:5 66:7,13 67:11,19,21,23,24 69:4,10 70:3 71:3, 24 73:19 74:6 75:13,14 80:13,14, 16 83:18 85:4,6,8, 13 86:9,11 87:16 89:6 90:25 94:2,3 95:3,4,14 98:9,11, 19 99:16,19 103:7, 24 104:16,19 105:1,16,19 106:9 109:25 110:17,20, 25 111:21,23,25 112:4 115:13,23 116:1,24 117:6 118:3,4 121:2,23 122:7,20 125:10 127:6,9,19 128:18 132:25 145:19 146:14 148:6,10 150:3 151:19 152:8,10,11 154:20 158:8 wouldn't 26:22 29:25 30:12 33:13 39:16 53:11 64:11 69:6 78:23 94:5,7,8 116:23 152:18 write 143:17 144:18 151:10 writing 103:12,18, 25 107:19 121:7 137:2 written 45:19 102:17,19 103:14, 20 121:2,6 140:8,	11 142:10,22 143:22 144:2 145:1 146:2 152:8 wrong 121:18 139:8 wrote 147:22 <hr/> X <hr/> X-RAY 26:5 <hr/> Y <hr/> y'all 11:1 38:7 63:21 yeah 14:10 19:15 58:5 66:22 68:3,4 82:8 83:4 87:25 97:4 110:16 136:22 139:22 140:2 150:20 157:14 year 8:7 10:8 11:18 13:1,24 14:6 16:14 34:10 35:19 45:4 61:15,18 62:11,14, 15 134:18 years 7:5,7 8:15 9:16 11:9 12:21 15:17 18:16 35:9 38:19 50:4 61:2 62:20 64:16,24 97:11 141:19 142:3 151:25 154:14 years' 39:2 yes 5:15,18,20,22 6:20,23 9:15,18,25 10:4 11:6 12:1 13:17 15:2 16:2 17:13,14,19 18:21 19:22,24 20:2,21, 23 22:1 23:22,24
--	--	--	--

28:2,10 29:18,21 30:6 31:11,18 33:6, 7 34:13,25 37:21 40:16 42:8 43:6,22 44:13 46:8 47:2 48:22 51:3 52:6 53:8 54:7 55:3,6 56:2,17,25 58:8,9, 12,14,23 59:16 62:3,9,20 67:21 69:2 70:3,22 71:2 73:12 74:8 75:7,17, 24 76:22 77:1 78:8 79:2,19,23 80:5 81:19,24 83:1,4,8, 17 85:16 86:23 87:18 88:9 89:2,17, 18 90:16 91:8,9,17 93:24 94:2 96:5,13 98:9,25 99:24 100:11,17 101:3 102:21 103:22 105:15 106:15,19, 25 107:3,5 108:10 109:4,10 110:2,15, 22,25 112:6,23 113:6,8 116:6 117:10 118:5,6 119:19 120:5,21 121:10 122:2,4 123:6 124:4,13 125:16 126:1,6,23 127:2,5,16,19 129:12 130:1,5,9, 23 131:3,20,24 134:14 135:12,22 136:5 137:5,18,20, 21,25 138:2 139:18 140:18,22,24 142:20 144:20,23 145:2,14,17 146:5, 19 148:19 149:2,8 150:7,16 151:2,9, 21 152:9,11,21 153:9,11,18 155:6	156:19 158:2,15,17 yesterday 4:13 5:1 57:25 58:7 67:16 130:13 yet 19:4 you 4:6,8,9,16,19, 20 5:2,3,4,13,16, 19,23,24,25 6:4,9, 13,18,21,24,25 7:1, 4,6,12,23,24 8:6,8, 14,20,25 9:10,13, 19,23 10:2,7,13,18 11:7,16,25 12:4,12, 14,18,20,25 13:8, 15,18,21 14:4,25 15:16,25 16:3,6,10, 14,18,19,20,21 17:7,12,18 18:2,3, 10,19,23 19:18 20:6,8,13,18 21:11, 12 22:10,11,15,21 23:1,3,6,8,10,13, 15,16,20,23 24:18, 20 26:18 27:6 28:1, 12,24,25 29:1,8,23, 24 30:2,3,4,9,12, 17,21 31:9,15,17, 23,24 32:4,22 33:1, 14,15,25 34:5,11 35:1,13 36:21,23 38:10,16,23,24 39:10,18 40:1,5,11 41:4,25 43:10,20 45:10,25 46:24,25 47:3,23 48:1,6,21, 23 49:5,6,17,18 50:2,10,12,16,17, 18,20 51:1,2,4,6,7, 12,16 52:2,4,7,10, 17 53:7 54:8,9,18 55:4,15,23,25 56:4, 16,18 57:2,3,4,7, 13,16,19 58:11,13, 15,21,25 59:4,6,9,	12,14,21 60:5,8,10, 15,19 61:5,6,7,9, 12,14,17 62:8,15, 17,18 63:11 64:2,4, 6,14,23 65:1,2,8,9, 17,24 66:11,12,14, 15,19 67:2,7,9,17, 18,20 68:1,7,12 69:3,4,8,10,11,23 70:2,6,7,13,17,23, 25 71:3,6,8,16,21 72:1,5,9,17,23,25 73:11,13,15,19,22, 23 74:2,6,9,12,16, 18 75:8,11,15,18, 22 76:2,5,6,9,15, 23,25 77:2,5,13,16, 18 78:2,4,17,22,23, 25 79:11,14,20,22, 24 80:4,6,12,16,18, 20,25 81:6,25 82:4, 9,15 83:2,16,22 84:3,5,17,19,20 85:17,20 86:21 87:2,11,16 88:4,19 89:3,14,19 90:14 91:2,18,19 92:13, 23 93:25 94:14 95:6,7,20 96:3,6,7, 16 97:1 98:2,4,5, 11,16,21 99:11,12, 14,18,19 100:2,12, 16,18,21,22 101:1, 2,8,20,23 102:13, 14 103:4,19 104:1, 7,14,15,19,21 105:1,2,7,13,16,25 106:6,9,14,17,20 107:4,6,10,12,23 108:6 109:2,14 110:3,4,7,8,10,17, 20 111:14 112:13, 14,15,21,24 113:5, 7,9,12,15 114:7 115:12,13,18	116:1,4,7,16 117:12,21,25 118:3,4,7,14,23 119:2,4,6,7,8,12,19 120:6,11,14,22,25 122:25 124:8,16,25 125:5,14,15,18,23 126:5,10,15 127:6, 7,14,22 129:5,8,10, 14,16,20,24 130:15,20,21 131:1,4,8,12,16,22, 23 132:4,10,16,22, 23,25 133:4,12,23 134:12,13,15,17, 20,25 135:8,10,20, 24 136:2,3,6,16,19, 22 137:12,16,22,24 138:1,3,8,12,23 139:14,16 140:6,9, 14,17,21,25 141:5, 15,17,22,23 142:5, 11,19,21 143:2,13, 15 144:4,11,17 145:11,16,20,25 146:10,13,18 147:12,15 148:4,7, 8,17,25 149:3,10, 16 150:4,17,21 151:1,8,10,19 152:4,16,20,22 153:13,25 154:1,4, 18,19 155:4,7,12, 18,24 156:1,7,8,9, 12,16,20 157:4,21 158:1,3,13,23,24 159:1,3 you'd 30:21 you'll 29:13,14 75:18 you're 5:24,25 6:1 9:8 16:21 19:23 23:4 46:1 50:13 51:23 52:8 56:23
---	---	--	--

79:11 123:25

130:16,17

you've 52:2 60:24

61:9 70:8 74:1 76:3

100:9

young 34:9

your 4:11 5:3,5,8

6:4,7,9 7:15,23

8:11,23 12:11,19

13:3 16:18,21,24

17:1 18:18,23 20:3,

9 24:21,22 34:12,

15 38:5,10 51:24

52:13 57:12 59:14

60:25 61:10,15,17

62:10,14,18 63:4

67:16 68:8 70:20

71:8 72:2,9,10,17,

22 73:16,19 74:3,5,

9 76:20 77:24 78:2,

25 79:1,18 81:17

82:7,21 88:24 96:7,

11 103:14 104:25

107:1 128:16

134:3,19 139:10,25

141:5,22 142:6

144:8 146:4,12

147:11 152:13

153:1,10,12 157:7

158:13,14,23

yourself 73:23

Z

zero 114:20 115:12

116:7,9

ZIP 6:11 17:1,3

P. White- Campbell Statement re Incident
with J. White

July 18, 2018

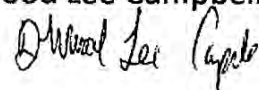
Statement regarding accusation made by Dep. J.J. White.

On Monday July 16, 2018, I was contacted by Capt. Watkins and requested to write a statement in reference to the previous incident involving Dep. White and myself from back in January.

The specific accusation was that I told Dep. White "didn't I tell your ass not to do that anymore and I will take care of your ass when I get to work". This conversation took place about six months ago, and I did not copy down word for word what was said, but I do remember being quite angry with him that morning over continued defiance of instructions given to him to stop taking out criminal summons on people he encountered for every little thing he saw. I do not remember the specific wording I used during that conversation, nor can I deny that as upset as I was I did not say that either.

As for the incident in the Sheriff's office later in the day, I did not say anything initially. I overheard a conversation taking place in the patrol room that was getting heated between Dep. White, Poole and Sgt. Alexander. I stepped out into the room just to see what was going on and Dep. White then began making statements to me. Dep. White got up from his seat, and started walking toward me making verbal and hand gestures, but then stopped. There was a heated exchange between us as well, but I do not remember using any specific foul language toward him while addressing him.

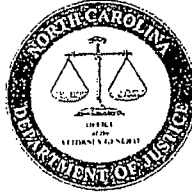
Durwood Lee Campbell



P. White- J. White Firearms Quals

CRIMINAL JUSTICE EDUCATION AND TRAINING STANDARDS COMMISSION
NORTH CAROLINA SHERIFFS' EDUCATION AND TRAINING STANDARDS COMMISSION

Sheriffs' Standards Division
PO Box 629
Raleigh, NC 27602
Telephone: (919) 779-8213
Fax: (919) 662-4515



Criminal Justice Standards Division
Post Office Drawer 149
Raleigh, NC 27602
Telephone: (919) 661-5980
Fax: (919) 779-8210

FIREARMS QUALIFICATION RECORD INSTRUCTIONS

Form F-9A (rev. 3.30.17)

This form must be utilized to record the annual In-Service Firearms Training and Qualification for each certified officer in compliance with 12 NCAC 9E .0100 or 12 NCAC 10B .2104. A copy must be maintained in each officer's personnel file at the employing agency, and must be available for inspection by a Commission Staff member. A copy must be attached to the F-5A and submitted to the Criminal Justice Standards Division for all new hires.

- SECTION I: Must be completed for every officer.
SECTION II: Must be completed for every officer and signed and dated by the instructor(s).
SECTION III: Must be signed and dated by the officer.
SECTION IV: Must be signed and dated by the Agency Head or designated representative.
SECTION V: Must be completed and signed by the specific certified Specialized Firearms Instructor(s).

I. OFFICER'S NAME: Justin J White SSN (Last 4): 6961
Certified by: NC Criminal Justice Education and Training Standards Commission: ☐ Yes ☐ No
Certified by: NC Sheriffs' Education and Training Standards Commission: ☒ Yes ☐ No
EMPLOYING/APPOINTING AGENCY: Vance County Sheriff's Office

II. FIREARMS INSTRUCTOR COMPLIANCE - CLASSROOM REQUIREMENT

As a Specialized Firearms Instructor, I do hereby certify that the officer listed above has completed the mandatory classroom portion of the in-service firearms training, as specified in 12 NCAC 9E .0105 or 12 NCAC 10B .2103 as applicable. Failure to complete this training requires that the agency head or designated representative be notified.

The classroom session was completed on 6-5-17 (date).
R.T. Robinson R.T. Robinson 100094952 6-5-17
Print Name of Firearms Instructor Signature of Firearms Instructor Instructor # Date Signed

III. ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

I do hereby certify that I have been advised of my firearms qualification scores by the Specialized Firearms Instructor(s) indicated. I also understand that if I have failed to qualify with any weapons(s) required, I may not carry and/or have access to the weapon until such time as I have qualified. I further understand that I must notify my agency head or designated representative within 24 hours of my failure to qualify, and/or successfully complete the training portion as prescribed in 12 NCAC .9E .0105 or 12 NCAC 10B .2103 as applicable.

[Signature] 6-5-17
Signature of Officer Date Signed

IV. AGENCY ACKNOWLEDGEMENT OF QUALIFICATION SCORES:

As agency head, or designated representative, the below signature acknowledges receipt of the above officer's qualification scores and attests that the above officer has satisfactorily completed training on this department's policies regarding the use of force, N.C. State law regarding the use of deadly force, relevant case law, and safety and marksmanship as required in 12 NCAC 9E .0105 or 12 NCAC 10B .2103. I understand that if the officer has failed to qualify with any weapon(s), then I must restrict access to all applicable weapon(s) until such time as the officer has qualified with same.

☒ I certify that the in-service firearms training consisted of a minimum of six (6) hours/credits (For Criminal Justice Commission only.)

[Signature] 6-5-17
Signature of Agency Head/Designated Representative Date Signed

*As a certified Specialized Firearms Instructor, I hereby certify that the officer listed below has attained the score(s) as documented below. I understand that if the officer has failed to qualify, then I must deliver a copy of this form to the officer's agency head or designated representative within 72 hours either in person, or by certified mail.

OFFICER'S NAME: Justin T White NAME OR RANGE LOCATION: Henderson Training Center F-9A (rev. 3/30.17)

SERVICE HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
6/5/2017	SA	Sig Sauer	P220	45 CAL	G310644	230 gr	Day	92.0	Yes	R.T. Robinson - R.T. Robinson 100094952
6/5/2017	SA	Sig Sauer	P220	45 CAL	G310644	230 gr	Night	90.0	Yes	R.T. Robinson - R.T. Robinson 100094952

OFF-DUTY HANDGUN QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number

HOTGUN/RIFLE QUALIFICATION

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number
6/5/2017	SG	Remington	870	12 gauge	AB109369M	00 Buck	Day	84.0	Yes	R.T. Robinson - R.T. Robinson 100094952
6/5/2017	SG	Remington	870	12 gauge	AB109369M	00 Buck	Night	85	Yes	R.T. Robinson - R.T. Robinson 100094952

UTOMATIC/SPECIALTY WEAPONS/OTHER

Date	Weapon Type	Make	Model	Caliber or Gauge	Serial #	Ammunition	Day(D) Night(N)	Score (%) or (P)(F)	Quality Yes/No	Print and Sign Name & Instructor Number

COMBAT COURSE

Date	Day/Night	Pass/Fail	Comments	Print and Sign Name & Instructor Number
6/5/2017	Day	P	No Problems Note C	R.T. Robinson - R.T. Robinson 100094952
6/5/2017	Night	P	No Problems Note C	R.T. Robinson - R.T. Robinson 100094952

Revolver
1. Semi Auto Handgun
2. Shotgun
3. Automatic Weapon
4. Rifle

SW - Smith & Wesson
GLO - Glock
BER - Beretta
RUG - Ruger
SIG - Sig Sauer

BEN - Benelli
CLT - Colt
WIN - Winchester
ARA - Armalite
SAV - Savage

BRO - Browning
H&K - Heckler & Koch
MOS - Mosberg
REM - Remington
BUS - Bushmaster

SW - Specialized Weapon
SPF - Springfield
RRV - Rock River

Ammunition- Must be duty ammunition or ballistic equivalent ammunition.
Include sufficient information to fully describe such as caliber, projectile weight and type.
*Sheriff's Standards handgun night requires use of flashlight at the 5-yd line
*Sheriff's Standards accepts pass/fail rather than % scores

TITLE: USE OF DEADLY FORCE - HANDOUT

NORTH CAROLINA GENERAL STATUTE 15A-401 (d) (2) - USE OF FORCE IN ARREST.

A LAW ENFORCEMENT OFFICER IS JUSTIFIED IN USING DEADLY PHYSICAL FORCE UPON ANOTHER PERSON FOR A PURPOSE SPECIFIED IN SUBDIVISION (1) OF THIS SUBSECTION ONLY WHEN IT IS OR APPEARS TO REASONABLY NECESSARY THEREBY:

- A) TO DEFEND HIMSELF OR A THIRD PERSON FROM WHAT HE REASONABLY BELIEVES TO THE USE IMMINENT USE OF DEADLY PHYSICAL FORCE:
- B) TO EFFECT AN ARREST OR PREVENT THE ESCAPE FROM THE CUSTODY OF A PERSON WHO HE REASONABLY BELIEVES IS ATTEMPTING TO ESCAPE BY MEANS OF A DEADLY WEAPON, OR WHO BY HIS CONDUCT OR ANY OTHER MEANS INDICATES THAT HE PRESENTS AN IMMINENT THREAT OF DEATH OR SERIOUS PHYSICAL INJURY TO OTHERS UNLESS APPREHENDED WITHOUT DELAY; OR
- C) TO PREVENT THE ESCAPE OF A PERSON FROM CUSTODY IMPOSED UPON HIM AS A RESULT OF CONVICTION FOR A FELONY.

NOTHING IN THIS SUBDIVISION CONSTITUTES JUSTIFICATION FOR WILLFUL, MALICIOUS OR CRIMINAL NEGLIGENT CONDUCT ANY PERSON WHICH INJURES OR ENDANGERS ANY PERSON OR PROPERTY, NOR SHALL IT BE CONSTRUED TO EXCUSE OR JUSTIFY THE USE OF UNREASONABLE OR EXCESSIVE FORCE.

NOTE: A LAW ENFORCEMENT OFFICER ACTING OUTSIDE OF HIS/HER JURISDICTION ASSUMES THE IDENTITY OF A PRIVATE CITIZEN. WHILE THERE MAY BE JUSTIFICATION FOR THE INDIVIDUAL'S ACTION WHEN CONFRONTED WITH A CRIMINAL SITUATION, THE OFFICER IS STILL CIVILLY LIABLE. IT IS IMPORTANT TO NOTE THAT A CIVIL JURY MAY VIEW THIS ACTIONS AS A CITIZEN ALTOGETHER DIFFERENTLY THAN IF WERE ACTING AS A SWORN OFFICER WITHIN HIS JURISDICTIONAL LIMITS.

100094950
INSTRUCTOR: R.T. Robinson DATE: 6-5-17
STUDENT(S) SIGNATURE: [Signature] 6/5/17

P. White- J. White Raise



Vance County Human Resources
122 Young Street, Suite B
Henderson, NC 27536

June 6, 2018

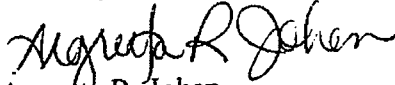
Justin White
Deputy Sheriff

Dear Mr. White;

On June 5, 2018, you satisfied the eligibility period to receive the first year law enforcement officer \$1,500 salary adjustment. Your annual salary will be \$34,764 effective June 5, 2018.

If you have any questions, please feel free to give me a call at the above number.

Sincerely,


Argretta R. Johen

c: Sheriff Peter White

Argretta R. Johen, HR Director
(252) 738-2014
(252) 430-0290 (Fax)

Johanna M. Torres, HR Specialist
(252) 738-2017

P. White- J. White Rebuttal to Alexander Appraisal

Justin Jamel White

HR on 6/20/18
1/3

130 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 • Justinwhitencssd@yahoo.com

June 15th, 2018

Transmitted via Hand Delivery

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536
Pwhite@vancecounty.org

Personnel Sensitive, Confidential & Sworn File

Re: Employee Performance Appraisal Rebuttal

Dear Sheriff

I, Justin J. White, deputy sheriff, hereby file rebuttal in reference to the aforementioned done by Sergeant Myron D. Alexander (S-12), Patrol Supervisor. Same was done on June 1st, 2018, 4 months approximately after I was transferred from his shift. I was notified of this document on June 8th, 2018, at 6 p.m. by Sgt. Chris M. Welborn (S-13), Patrol Supervisor & presented with same to sign in which I noted being in strong disagreement with. I shared my dissent with Sgt. Welborn, in which Sgt. Bobby Martin (S-11) was present & I was told to appeal it. Attached is a copy of my performance appraisal.

Sgt. Welborn advised me, JJ (me) you are a good employee, you work & you got some know how. Sgt. Welborn stated, this report is biased because Myron have personal issues with you. He advised me, you are a team player & professional with the citizens & us but I do get a little carried away from time to time but not too much. Sgt. Welborn claimed, JJ we all get a little carried away from time to time, it's going to happen. Sgt. Welborn stated, you are not insubordinate, you follow orders & do your job. Sgt. Welborn stated, go to the sheriff & talk to him.

Sgt. Bobby Martin advised me to file a rebuttal with the High Sheriff so it can be reviewed & removed from my file & if it was not overturned then for the rebuttal to be attached to the performance evaluation. Also, Sgt. Martin advised me that he had the same situation happen with a supervisor in investigations. Sgt. Martin claimed to have prepared a rebuttal & presented same to you & asked to be transferred since he could not satisfy his supervisor. Sgt. Martin won his case.

First & foremost, I am a stern & firm individual. I am shocked that Sgt. Alexander portrayed me negatively especially when he claimed that he did not have a problem with my job performance and or personal conduct in early January 2018 during a meeting with management, supervision & subordinates. Also, I have not been written up several times for my attitude & work ethics, nor have I been very insubordinate towards supervisors. Based on those deceptive & frivolous allegations, I request to view & copy my complete personnel file. It should be noted, I asked to see the file that Chief Bullock had when I was suspended in February 2018, in which I was denied & told, you have everything you need.

EX. F

How can Sgt. Alexander adjudicate my performance or personal conduct when he does not show up to work on time & has been a no call no show on calls for service on various occasions with staff that have requested back up? He is the king of absenteeism & tardiness. In fact, he is the reason why a memo was issued 6-7 months ago for patrol to report to clock on at 5:30 and report to work at 5:45 & he does not adhere to same. Plenty of times, my supervisor & I waited for him to come to work & he would show up at 7 a.m. but his staff was on time. It is substantially rare for him to clock on on-time.

For example, Sgt. Alexander failed to report to work on time for 1 ½ hrs approximately, leaving me to answer calls in county alone & without back up, he gave Deputy I. Greene (trainee at-the-time) & Deputy T. Terry permission to come in late by using comp time. A burglary call (10-62 in progress) was assigned to me which was later downgraded to a prowler (10-76). Both calls for service were/are priority. The caller stated someone was trying to break into her residence & hung up. Then, she called back saying someone was trying to come through her window & that she heard them outside. I determined it was not a burglary or prowler but the wind causing the metal antenna & electric wires on her trailer to mimic same. In fact, day shift who was already off provided back up without my request since I was by myself. Sgt. Alexander was not appropriately disciplined for lying to Lt. Campbell (insubordination) claiming he was at work, when he was not, neglecting duty and failing to report as scheduled.

Deputy Branch (S-34) went to the sheriff's office on his day off a few months ago & met with Chief Bullock & Captain Watkins in reference to complaining on Sgt. Alexander pertinent to him not answering calls, not backing up deputies & not being accessible. As a matter of fact, Deputy Branch reported to management, supervision & co-workers that Sgt. Alexander was clearing calls after riding past the house & not stopping. Deputy Branch requested to be transferred to another shift & management told him to tough it out until the guys were out of training in May.

Deputy Poole (S-40) complained on Sgt. Alexander & wanted to be moved. In fact, on a call in January 2018, in which we had a burglary in progress call during the winter storm & Sgt. Alexander & Deputy Greene (S-41) were closer. Deputy Poole & I were near U.S. 1 S by the Franklin & Vance county line & we got there first & handled same despite them being on Warrenton road near U.S. 1. That incident triggered Deputy Poole's 10 day suspension, however, no one got on Myron for threatening Deputy Poole on the radio, you want to put your life on it in reference to who was closer to Regina Lane. Also, Sgt. Alexander, told Deputy Poole on the phone, I don't have to answer call because I am the supervisor.

Deputy Burns had problems with Sgt. Alexander not working & was constantly complaining on him to the Chief Bullock & Capt. Watkins. Also, former Deputy Lauren Matthews had a host of problems with Sgt. Alexander & was complaining.

According to supervision, every person that goes to his shift, either gets transferred or quits.

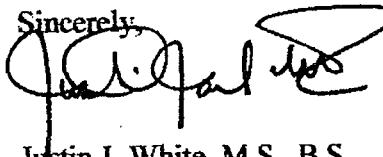
130 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 • jwhite@kittrell-nc.com

As a matter of recent fact, Deputy Al-Wadeii (S-28) worked Sgt. Alexander's shift f & was complaining to supervision on the other shift that he called for backup on Vicksboro Road & no one came but Deputy Edwards (S-24), who was the Northside car. Deputy Edwards stated he diverted from a call (pending) because Deputy Al-Wadeii called for help. Deputy Al-Wadeii claimed that Sgt. Alexander & Deputy Greene are always together.

As you can see, Sgt. Alexander has a history of unacceptable personal conduct and or grossly inefficient job performance. These matters needed attention. It is to my recommendation that Sgt. Alexander be suspended for 15 days without pay & demoted.

I look forward in hearing from you & resolving this matter internally.

Sincerely,

 6-20-18

Justin J. White, M.S., B.S.

Enclosures: (1)

Performance Appraisal

Cc: File

Argretta Johen, HR Director

Peter White, High Sheriff

Justin White, Deputy Sheriff

Chris Welborn, Sergeant

Bobby Martin, Sergeant

State of North Carolina

County of Vance

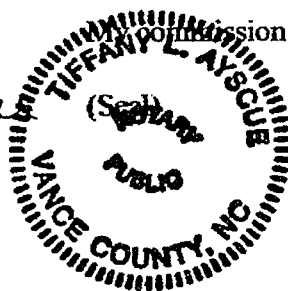
On this, the 20 day of June, 2018, before me a notary public, the undersigned party, personally appeared Justin J. White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.

Tiffany L. Ayscue
Notary Name

Tiffany L. Ayscue
Notary Signature

My commission expires: July 31, 2019



June 15th, 2018

Transmitted via Hand Delivery

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536

Personnel Sensitive, Confidential & Sworn File

Re: Title VII Civil Rights Act of 1964-Race & Gender Discrimination

Dear Sheriff

I, Justin Jamel White, deputy sheriff at the Vance County Sheriff's Office, hereby file written complaint pertinent to race and gender discrimination.

On February 20th, 2018, I was written up and suspended for 5 days without pay, publicly humiliated by the department, having to walk out of the sheriff's office without a gun and badge and being stripped of my law enforcement credentials. On my way out, I encountered several deputy sheriffs, who saw me after the issuance of corrective action. **I was heavily lied on by Lt. Durwood Campbell (S-7) and no member of management seemed to care.**

Lt. Campbell is a Caucasian male and I am an African American male. Jamie Goss, Caucasian female, called and complained which triggered this entire ordeal despite me being in the performance of my job duties and responsibilities. My main duty is to answer calls, patrol the county, observe and enforce violations of law/county ordinances. It should be noted, On June 5th, 2018, Ms. Goss pled guilty. **It is going to be too late to correct someone's action when he or she and innocent third parties are tragically killed as a result of a motorist illegally gross decisions under the wheel.** I am happy to discuss the incidents involving this in the near future.

I was never given a chance to share my side in reference to providing verbal or written statement in reference to the deceptively egregious allegations by Lt. Durwood Campbell. Per Sheriff White, Chief Lawrence Bullock and Captain Watkins were directed to get my side of the story before corrective action was issued. **That did not happen.** {It should be noted, this is not the first instance of insubordination with Chief Bullock and Captain Watkins as the Sheriff directed both of them to put me back on Sgt. Roberson's (S-10) shift in December 2017 and January 2018. This is because the shift transfer was not approved by the High Sheriff nor was it submitted to the Chief Deputy for review and submission for approval to the Sheriff. Also, the Sheriff did not delegate authority to Capt. Watkins or Lt. Campbell to transfer staff}. No one talked to me about anything. Out of the blue, I walk in and is suspended over hot lies. It should be noted, Chief Bullock and Capt. Watkins were insubordinate to the Sheriff by not getting my take on the situation. **Based on mere appearance, the County of Vance, NC and Sheriff Office took the white man's word over the black man.** Same is a civil rights violation.

Lt. Campbell cursed, fussed & threatened me in the presence of third parties. The first time, Deputy Poole was present in the patrol room & the second time, Sgt. Alexander & Deputy Poole were present (patrol room). I am happy to discuss the incidents involving this in the near future.

I have direct evidence of both situations and look forward to presenting same. I believe we may be able to rectify this situation administratively. My pay check was docked 911.00 dollars and 28 hours of overtime went down the drain over lies and errors by management. It should be noted, the sheriff's office nor HR will not receive copies of my evidence. If the situation goes to trial in a federal court of competent jurisdiction i.e. EEO and or state court of competent jurisdiction i.e. defamation of character, libel and slander, negligence, then it will be provided during discovery as ordered by the courts.

It should be noted, there is a pattern of discrimination and negligence at the sheriff's office. Upon hire, I begged Lt. Ray Shearin (S-4) for a bullet proof vest for 3 weeks and was only given one after I approached the command staff while they were reading reports in late June 2017 and Captain W.W. Bullock (S-3) ordered him to find me a vest. I responded to emergency calls i.e. burglary in progress, no vest.

From late June 2018 until August 2018, I begged for tires on my patrol vehicle to no avail for nearly 8 weeks. I followed the chain of command, Sgt. Roberson (S-10), Lt. Shearin and former Captain now Chief, L.D. Bullock (S-2) requesting tires. Sgt. Roberson eventually told me to stop asking and go to the sheriff because these people don't do their jobs. As I was going to see the Sheriff, Capt. Bullock asked what's wrong? (After I walked in his office for the third time) and where is your car? He saw the car and went to Lt. Shearin and I got some tires same day despite both of them knowing I needed tires prior to. The metal wires were showing on rear tires.

Last July 2017, Deputy Warren Durham (S-95) heard a bullet ricochet off of his vehicle on Breckenridge Street, near the jail and feared for his life. That was the same night that former Deputy Erik Sheftal (S-29) held a suspect at gun point in the city limits of Henderson by the library. Deputy Durham had previously asked Lt. Shearin for a vest to no avail.

In January 2018, Deputy Al-Wadeii (S-28) was responding to calls without a vest with Lt. Campbell and I questioned him being on the streets without a vest. Lt. Campbell called Lt. Shearin and he came to the sheriff's office and issued him a vest (speedily despite my situation).

It should be noted, Lt. Shearin is a Caucasian male and the parties listed above are minorities. This is a civil rights issues. Also, Lt. Shearin was directed by the High Sheriff to issue me equipment i.e. in September 2018 twice to no avail

While I serve at the pleasure of, I contend these issue do not fit the criteria as they would reasonably violate county and or departmental policy, federal civil rights laws, NC Public Policy Doctrine, NC Tort Law, etc. Also, taking adverse action against someone after reporting the aforementioned is reprisal and or retaliation. How can one write up, suspend and dock pay of the black man but the same alleged offenses are being committed by white deputies? How can one

write up, suspend and dock pay of subordinate but allow other supervisory or managerial deputies to get away with it? How can the subordinate deputy be suspend for insubordination & the chief deputy, captain & lieutenant are not held to the same standard for being insubordinate?

*******SOMETHING IS WRONG WITH THIS PICTURE & NEEDS CORRECTING*******

It is to my recommendation that Chief Bullock be issued a corrective action and suspended for 10 days without pay in reference to insubordination by not returning me to Sgt. Roberson's shift and not obtaining statements for the allegations made by Lt. Campbell.

It is to my recommendation that Capt. Watkins receive a lesser sanction as the chief deputy had the overall responsibility as the manager with rank/seniority to ensure my transfer back to Sgt. Roberson's shift and that they met with me about the allegations by Lt. Campbell.

It is to my recommendation that Lt. Shearin be issued corrective action and suspended for 10 days without pay and demoted in reference to failing the issue the protective and necessary law enforcement equipment after being directed to do so by the Sheriff several times.

It is to my recommendation that Lt. Campbell be issued corrective action, suspended for 10 days without pay & demoted for his official misconduct & verbal/written deception pertinent to the write up.

I understand it will be difficult in disciplining members of your command staff but as you said in times past, we have to be fair.

There were no legitimate non-discriminatory reasons to issue corrective action and authorize adverse action. There are no bona-fide reasons and or business necessity for the abovementioned. Even if responsibility laid with me, then the mixed motive legal theory would apply.

I look forward in hearing from you and resolving this issue.

Sincerely,

Justin White, M.S., B.S

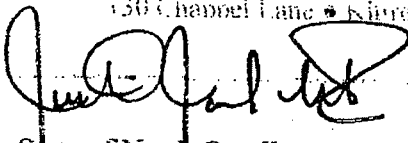
Jw- 4-22-2018

Cc: File

Argretta Johen, HR Director

Peter White, High Sheriff

Justin White, Deputy Sheriff



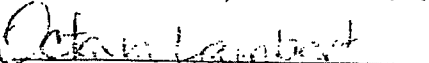
6/22/2018

2 Pages

State of North Carolina
County of Vance

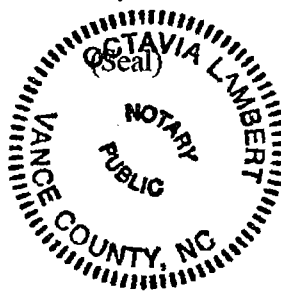
On this, the 22nd day of June, 2018, before me a notary public, the undersigned party, personally appeared Octavia Lambert, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.


Notary Name


Notary Signature

My commission expires: July 2, 2020



Status of Complaint

Justin White

Wed 7/11/2018 11:39 AM

To: Peter White <pwhite@vancecounty.org>;

Cc: Argretta Johen <AReid@vancecounty.org>; Justin White <JWhite@vancecounty.org>;

Good morning,

The purpose of this e-mail is to determine the status of the race and gender discrimination inquiry. It has been approximately three weeks since filing same. Also, I have requested a meeting with you and Argretta not withstanding pertinent parties listed in the unlawful, wrongful and tortious corrective action initiated by Lt. Durwood Campbell as his signature is listed on the aforementioned.

While to the best of your knowledge designated members of your command staff met with me, same is not accurate nor truthful. Let me be clear, I walked into a trap, stripped of my law enforcement credentials and gear, escorted to Ray's vehicle without a gun (someone could have been waiting around the corner to hurt me and I would have been defenseless all because of the deception and discrimination of a white supervisor involving a white female citizen), suspended without pay and transferred shifts (adverse action). Since Lt. Campbell and both shifts sergeants are working today, I can find no reason for all us to meet between today and Friday. Once the dust settles, members of your command staff should be disciplined because of their insubordination, etc.

Sheriff White and Director Johen, we have to do what is right regardless of our constitutional and hired positions. We cannot unfairly treat people but we must embrace our co-workers in the spirit of truth. I look forward to confronting my accusers with factual basis in this administrative issue in order to arrive at an internal conclusion. Please advise the status of the investigation. I look forwarding in hearing from both of you.

Warm Regards,

Justin White, M.S.

P. White- Notice of Charge of Discrimination

Notice of Charge of Discrimination

U.S. Equal Employment Opportunity Commission <noreply@eeoc.gov>

Wed 9/12/2018 10:15 AM

To: Argretta Johen <AReid@vancecounty.org>

U.S. Equal Employment Opportunity Commission
Raleigh Area Office
434 Fayetteville Street, Suite 700
Raleigh, NC 27601

NOTICE OF CHARGE OF DISCRIMINATION (This Notice replaces EEOC FORM 131)

DIGITAL CHARGE SYSTEM

September 12, 2018

To:
Mrs. Argretta Johen
Director, Human Resources
VANCE COUNTY
AJOHEN@vancecounty.org

This is notice that a charge of employment discrimination has been filed with the EEOC against your organization by Justin White under: Title VII of the Civil Rights Act (Title VII). The circumstances of the alleged discrimination are based on Retaliation, Race, and Sex, and involve issues of Harassment, Discipline, and Terms/Conditions that are alleged to have occurred on or about Feb 20, 2018 through Aug 10, 2018.

The Digital Charge System makes investigations and communications with charging parties and respondents more efficient by digitizing charge documents. The charge is available for you to download from the EEOC Respondent Portal, EEOC's secure online system.

Please follow these instructions to view the charge within ten (10) days of receiving this Notice:

1. Access EEOC's secure online system: <https://nxcg.eeoc.gov/rsp/login.jsf>
2. Enter this EEOC Charge No.: 433-2018-03289
3. Enter this temporary password: nh5275qy

Once you log into the system, you can view and download the charge, and electronically submit documents to EEOC. The system will also advise you of possible actions or responses, and identify your EEOC point of contact for this charge.

If you are unable to log into the EEOC Respondent Portal or have any questions regarding the Digital Charge System, you can send an email to Raleigh@eeoc.gov.

Preservation of Records Requirement

EEOC regulations require respondents to preserve all payroll and personnel records relevant to the charge until final disposition of the charge or litigation. 29 CFR §1602.14. For more information on your obligation to preserve records, see <http://eeoc.gov/employers/recordkeeping.cfm>.

Non-Retaliation Requirements

The laws enforced by the EEOC prohibit retaliation against any individual because s/he has filed a charge, testified, assisted or participated in an investigation, proceeding or hearing under these laws. Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made. For more information, see <http://www.eeoc.gov/laws/types/facts-retal.cfm>.

Legal Representation

Although you do not have to be represented by an attorney while we handle this charge, you have a right, and may wish to retain an attorney to represent you. If you do retain an attorney, please provide the attorney's contact information when you log in to the online system.

U.S. Equal Employment Opportunity Commission
FEDERAL INVESTIGATION
REQUEST FOR POSITION STATEMENT
AND SUPPORTING DOCUMENTARY EVIDENCE

EEOC hereby requests that your organization submit within 30 days a Position Statement setting forth all facts which pertain to the allegations in the charge of discrimination under investigation, as well as any other facts which you deem relevant for EEOC's consideration.

We recommend you review EEOC's resource guide on "[Effective Position Statements](#)," as you prepare your response to this request.

Fact-Based Position Statement

This is your opportunity to raise any and all defenses, legal or factual, in response to each of the allegations of the charge. The position statement should set forth all of the facts relevant to respond to the allegations in the charge, as well as any other facts the Respondent deems pertinent to EEOC's consideration. The position statement should only refer to, but not identify, information that the Respondent asserts is sensitive medical information, or confidential commercial or financial information.

EEOC also requests that you submit all documentary evidence you believe is responsive to the allegations of the charge. If you submit only an advocacy statement, unsupported by documentary evidence, EEOC may conclude that Respondent has no evidence to support its defense to the allegations of the charge.

EEOC may release your position statement and non-confidential attachments to the Charging Party and her representative and allow them to respond to enable the EEOC to assess the credibility of the information provided by both parties. It is in the Respondent's interest to provide an effective position statement that focuses on the facts. EEOC will not release the Charging Party's response, if any, to the Respondent.

If no response is received to this request, EEOC may proceed directly to a determination on the merits of the charge based on the information at its disposal.

Signed by an Authorized Representative

The Position Statement should be signed by an officer, agent, or representative of Respondent authorized to speak officially on its behalf in this federal investigation.

Segregate Confidential Information into Separately Designated Attachments

If you rely on confidential medical or commercial information in the position statement, you should provide such information in separate attachments to the position statement labeled "Sensitive Medical Information," "Confidential Commercial or Financial Information," or "Trade Secret Information" as applicable. Provide an explanation justifying the confidential nature of the information contained in the attachments. Medical information about the Charging Party is not sensitive or confidential medical

information in relation to EEOC's investigation. Segregate the following information into separate attachments and designate them as follows:

- a. Sensitive medical information (except for the Charging Party's medical information).
- b. Social Security Numbers
- c. Confidential commercial or financial information.
- d. Trade secrets information.
- e. Non-relevant personally identifiable information of witnesses, comparators or third parties, for example, social security numbers, dates of birth in non-age cases, home addresses, personal phone numbers and email addresses, etc.
- f. Any reference to charges filed against the Respondent by other charging parties.

Requests for an Extension

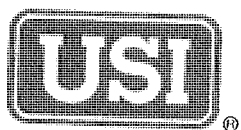
If Respondent believes it requires additional time to respond, it must, at the earliest possible time in advance of the due date, make a written request for extension, explain why an extension is necessary, and specify the amount of additional time needed to reply. Submitting a written request for extension of time does not automatically extend the deadline for providing the position statement.

Upload the Position Statement and Attachments into the Respondent Portal

You can upload your position statement and attachments into the Respondent Portal using the + Upload Documents button. Select the "Position Statement" Document Type and click the Save Upload button to send the Position Statement and attachments to EEOC. Once the Position Statement has been submitted, you will not be able to retract it via the Portal.

Please retain this notice for your records.

Notice of Confidentiality: The information contained in this transmission may contain privileged and confidential information, including information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact us at digital.support@eeoc.gov and destroy all copies of the original message and attachments.




JuWh 2/18 chg

2/18 JW chg!

JWh 20 [signature]

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div>433-2018-03289</div> </div>	
_____ and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Mr. Justin White		Home Phone (Incl. Area Code) (919) 961-3448	Date of Birth
Street Address 130 Chappell Lane, Kittrell, NC 27544		City, State and ZIP Code	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name VANCE COUNTY – OFFICE OF THE SHERIFF		No Employees, Members 500 or More	Phone No (Include Area Code) (252) 738-2200
Street Address 156 Church Street, Suite 004, Henderson, NC 27536		City, State and ZIP Code	
Name		No Employees, Members	Phone No (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input checked="" type="checkbox"/> RACE</div> <div style="width: 50%;"><input type="checkbox"/> COLOR</div> <div style="width: 50%;"><input checked="" type="checkbox"/> SEX</div> <div style="width: 50%;"><input type="checkbox"/> RELIGION</div> <div style="width: 50%;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="width: 50%;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="width: 50%;"><input type="checkbox"/> AGE</div> <div style="width: 50%;"><input type="checkbox"/> DISABILITY</div> <div style="width: 50%;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="width: 50%;"><input type="checkbox"/> OTHER (Specify)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 02-20-2018 08-10-2018 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I. During my employment with the Respondent, I have been the victim of harassment and differential treatment as it pertains to the terms and condition of employment in comparison to that of my non-Black coworkers. This involves but not limited to the areas of: Discipline; Corrective Action; Treatment; Disrespect; Issuance of Safety Equipment; Subordinate Status and Retaliation.</p> <p>II. I have not been provided with a reason for the differential treatment concerning the areas on the part of the Respondent.</p> <p>III. I believe I have been discriminated against based on my Race-Black, Gender-Male and in retaliation for taking part in a protected activity. I believe Respondent's actions are in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.	NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <u>August 29th 2018</u> <small>Date</small> </div> <div style="text-align: center;"> <u>Justin J. White</u> <small>Charging Party Signature</small> </div> </div>	<div style="text-align: center;">  <small>Charging Party Signature</small> </div>

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please notify EEOC or the state or local agency where you filed your charge if retaliation is taken against you or others who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

P. White- P. White Response to J. White re
Complaint

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

July 19, 2018

Deputy Justin J. White
156 Church Street, Suite 004
Henderson, NC 27536

Dear Deputy White:

This letter is being written in response to your complaint dated June 15, 2018 and received on June 26, 2018. In your complaint you reference "Title VII Civil Rights Act of 1964-Race & Gender Discrimination".

You were in fact suspended for five (5) days without pay beginning February 20, 2018, which included the working days February 20, 25, 26, 27 and 28 which is documented on the Personnel Action Form which you signed on February 20, 2018. This suspension as you know was for unbecoming conduct as listed on the Personnel/Payroll Action Form signed by you on February 20, 2018.

Yes, your gun and badge were kept here as well as your credentials (ID) which is customary during suspension periods. In this regard, you were treated no different than anyone else. There is no evidence that Lieutenant Campbell "heavily lied" on you as you stated in your complaint.

If you will recall, when you and I met after your suspension period ended, you admitted to saying the things to Lieutenant Campbell that he listed in the official written reprimand signed by you and he on February 20, 2018.

In regard to the Jamie Goss complaint, you had been told previously by Supervisors not to issue a criminal summons for a traffic violation or violations which was the basis of the Goss complaint, since she was served nearly 24 hours after the traffic stop. You had also been told not to focus on traffic stops since this is not your primary duty and you had not been issued a citation book. Ms. Goss was originally charged with Reckless Driving to Endanger, Driving Left of Center and a Seat Belt violation. On June 5, 2018, she pled guilty to one count of Improper Equipment while the other charges were dismissed. This is not a Caucasian/African American issue but simply you as a Deputy Sheriff with the Vance County Sheriff's Office doing what you are told and following instructions. When you made this vehicle stop knowing you were not able to issue a citation, you should have contacted a Supervisor on Duty instead of you issuing a criminal summons.

You were given a chance to "share your side" when you met with Chief L. D. Bullock, Captain L.Q. Watkins and Lieutenant D. Campbell. During this meeting, you denied making the statement listed in the reprimand dated January 27, 2018 and signed by you and Lieutenant Campbell.

In your capacity as a Deputy Sheriff, you do not get to say who on my Command Staff is "Insubordinate" to me and who is not. As Sheriff, that is my decision.

You began your Field Training on June 18, 2018 with the Sergeant Durwood Campbell. During your third week of training, you and two other trainees were rotated to different squads with you being assigned to Sergeant D. R. Roberson's squad to complete your training with Deputy Brian Wayne. You remained on this squad throughout your training and until November 2017. Due to issues within this squad you were then reassigned to the squad supervised by Sergeant Myron D. Alexander where you remained until your suspension on February 20, 2018. After returning from your suspension imposed by me, you were assigned to another squad supervised by Sergeant C. M. Welborn where you remain today.

The one rotation and two re-assignments to different squads had absolutely nothing to do with race, gender or anything else other than simply trying to place you where you would best fit and be of greater benefit to the Sheriff's Office.

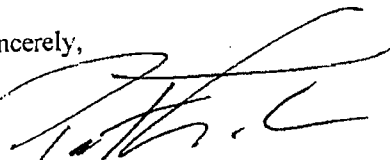
Once again, this is not a RACE, SEX or GENDER ISSUE nor any other form of discrimination. Lieutenant Campbell has admitted that he was angry with you during the telephone conversation and does not deny using the word "ass" while speaking with you, which is obviously inappropriate on his part. This has been addressed by me with Lieutenant Campbell. However, this does not excuse your conduct displayed while addressing a Superior Officer (Lieutenant Campbell) in the Patrol Squad Room.

Your suspension was approved by me based on your conduct in the Patrol Squad Room in the presence of Lieutenant Campbell, whom you were addressing, Sergeant Alexander and Deputy Poole. The suspension was carried out and Nine Hundred Eleven Dollars (\$911.00) was deducted from your pay.

I have not seen nor am I aware of any discrimination in the Vance County Sheriff's Office.

The incidents you alleged in your complaint involving other deputies and equipment issued is by no means discrimination. In addition, each of these deputies you mentioned is perfectly capable of speaking for themselves. In summary, I see nothing in your Complaint nor during this investigation to suggest discrimination in any shape, form or fashion.

Sincerely,



Sheriff Peter White
PW/jbm

On the date in question Lt.Campbell and Deputy White were arguing on the phone. Lt Campbell told Deputy White I done told your ass we do not give criminal summons for traffic issues. If you want to enforce traffic join the highway patrol but you are a sheriff your job is to answer calls and serve papers and then Lt. Campbell stated you know what I will deal with your ass at 12 when I come in.

Signed: Andre Poole

A handwritten signature in cursive script, appearing to read 'apal'.

07-17-18

P. White- Request for Training Waiver

Fw: Justin Jamel White

Weldon Bullock

Tue 6/5/2018 9:26 AM

To: Janie Martin <JMartin@vancecounty.org>; Peter White <pwhite@vancecounty.org>;

From: Konopka, Diane <dKonopka@ncdoj.gov>

Sent: Monday, June 4, 2018 1:46 PM

To: Weldon Bullock

Subject: RE: Justin Jamel White

Thanks Captain Bullock. I will put this before the Commission when they meet next week.

From: Weldon Bullock [mailto:WBullock@vancecounty.org]

Sent: Monday, June 04, 2018 12:56 PM

To: Konopka, Diane

Subject: Re: Justin Jamel White

Ms. Konopka,

I'm sending you this attachment per our conversation on Friday.

Weldon Bullock

From: Konopka, Diane <dKonopka@ncdoj.gov>

Sent: Monday, May 28, 2018 12:52:00 PM

To: Weldon Bullock

Subject: Justin Jamel White

Hello Captain Bullock,

I am reviewing a request from Justin Jamel White asking the Sheriffs' Commission to grant him a training waiver and credit him with the BLET he completed in December of 2015.

Can you tell me if the Vance County Sheriff's Office is also requesting (in support of) that waiver for Mr. White? Also, Mr. White stated you contacted Sheriffs' Standards on 6/5/2017 in regards to his certification. Do you remember who you spoke with and what specifically was discussed?

Please call me if we need to further discuss. Thank you for your help!
Diane



Diane N. Konopka
Director
Sheriffs' Standards Division
Phone: 919-662-4375
Fax: 919-662-4515
dkonopka@ncdoj.gov
1700 Tryon Park Drive, Raleigh, NC 27610
Post Office Box 629, Raleigh, NC 27602-0629
ncdoj.gov

Please note messages to or from this address may be public records.

PUBLIC RECORDS NOTICE: Please note that all emails, information and attachments sent to and from this address are subject to the North Carolina Public Records Act and, subject to certain statutory exceptions, may be disclosed to third parties.

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

June 1, 2018

Diane Konopka, Director
North Carolina Sheriffs' Education Training & Standards Division
Post Office Drawer 629
Raleigh, NC 27602-8213

RE: Justin Jamel White

Dear Ms. Konopka,

This is a written request asking The Sheriff's Commission to grant Justin Jamel White a training waiver and credit him with the BLET he completed in 2015. The Vance County Sheriff's Office is in full support of a waiver for Deputy White. Deputy White has been sworn with the Vance County Sheriff's Office since June 2017.

If you have need of any further information regarding Deputy White, please do not hesitate to contact me. Thank you for your attention in this matter.

Sincerely,

Sheriff Peter White
Vance County

PW/jbm

Reply all

Delete Junk

Justin Jamel White

Konopka, Diane <dKonopka@ncdoj.gov>

Reply all

Weldon Bullock

Action Items

Hello Captain Bullock,

I am reviewing a request from Justin Jamel White asking the Sheriffs' Commission to grant him a training waiver and credit him with the BLET he completed in December of 2015.

Can you tell me if the Vance County Sheriff's Office is also requesting (in support of) that waiver for Mr. White? Also, Mr. White stated you contacted Sheriffs' Standards on 6/5/2017 in regards to his certification. Do you remember who you spoke with and what specifically was discussed?

Please call me if we need to further discuss. Thank you for your help!
Diane



Diane N. Konopka
Director
Sheriffs' Standards Division
Phone: 919-662-4375
Fax: 919-662-4515
dkonopka@ncdoj.gov

ncdoj.gov

Please note messages to or from this address may be public records.

left message 5/24/18 @ 2:38p

F-5 Separation



Eff. Jan 2018

NORTH CAROLINA DEPARTMENT OF JUSTICE
SHERIFFS' STANDARDS DIVISION

JOSH STEIN
ATTORNEY GENERAL

POST OFFICE BOX 629
RALEIGH, NC 27602 - 0629
TELEPHONE: 919-779-8213 FAX: 919-662-4515

DIANE KONOPKA
DIRECTOR

REPORT OF SEPARATION

FORM F-5



DEPUTY SHERIFF



DETENTION OFFICER

INSTRUCTIONS: Please type or print all information clearly. This form shall be completed upon separation from one or both certified positions. This form must be submitted to the Commission **NO LATER THAN 10 DAYS AFTER FINAL SEPARATION**. A copy of this form must be retained in the appointing Agency's Personnel file.

SEPARATING AGENCY VANCE COUNTY SHERIFF'S OFFICE PHONE NUMBER (252) 738-2200

ADDRESS 156 CHURCH STREET, SUITE 004, HENDERSON, NC ZIP CODE 27536

OFFICER'S NAME JUSTIN JAMEL WHITE
(First) (Middle) (Last)

CURRENT HOME ADDRESS 130 CHAPPELL LANE, KITTRELL, NC 27544

DATE OF BIRTH 08/15/1989

SOCIAL SECURITY NUMBER [REDACTED]

DATE OF EMPLOYMENT: DEPUTY 06/05/2017

DETENTION OFFICER _____

POSITION/RANK DEPUTY SHERIFF



Full-Time



Part-time

DATE OF SEPARATION 10/24/2018



Death

Was this separation a result of a criminal investigation or violation of Commission rules?



YES



NO

Are you aware of any on-going or substantiated internal investigation regarding this officer within the last 18 months?



YES



NO

I, as an official representative of this agency, do advise that the above-named officer has been separated from this agency on the date indicated herein. In addition, pursuant to the requirements of 12 NCAC 10B .0405(c), the officer has been notified of this separation as evidenced by his/her signature below or the attached letter. IF this officer was ACTIVE between January and July, and did not complete the mandated In-Service Training, he/she must do so before becoming Active again. In addition, the obligation to notify the Sheriffs' Standards Division of criminal charges, domestic violence orders and civil no contact orders continues for one year from the date of separation.

[Signature]

Sheriff

10-25-18

Signature of Sheriff or Registered Authorized Representative

Title

Date

"Signature on file"

Signature of Officer

Date

**Officer has the right to submit a written statement of additional information to the Sheriffs' Standards Division regarding this separation.

EEOC Compl.

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 433-2018-03289	
_____ and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Mr. Justin White		Home Phone (Incl. Area Code) (919) 961-3448	
Street Address 130 Chappell Lane, Kittrell, NC 27544		City, State and ZIP Code	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name VANCE COUNTY – OFFICE OF THE SHERIFF		No. Employees, Members 500 or More	
Street Address 156 Church Street, Suite 004, Henderson, NC 27536		Phone No. (Include Area Code) (252) 738-2200	
City, State and ZIP Code		No. Employees, Members	
Name		Phone No. (Include Area Code)	
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 02-20-2018 08-10-2018 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I. During my employment with the Respondent, I have been the victim of harassment and differential treatment as it pertains to the terms and condition of employment in comparison to that of my non-Black coworkers. This involves but not limited to the areas of: Discipline; Corrective Action; Treatment; Disrespect; Issuance of Safety Equipment; Subordinate Status and Retaliation. II. I have not been provided with a reason for the differential treatment concerning the areas on the part of the Respondent. III. I believe I have been discriminated against based on my Race-Black, Gender-Male and in retaliation for taking part in a protected activity. I believe Respondent's actions are in violation of Title VII of the Civil Rights Act of 1964, as amended.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
August 29 th 2018 Justin J. White [Signature] Date Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please notify EEOC or the state or local agency where you filed your charge if retaliation is taken against you or others who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

J. White Inv.

Claim # 301812768110001

INCIDENT DATA	Agency Name VANCE COUNTY SHERIFF'S OFFICE		INCIDENT/INVESTIGATION REPORT		OCA 18013870																																																																																											
	ORI NC0910000				Date / Time Reported Month: 10 Day: 22 Yr: 2018 Time: 20:16 Hrs																																																																																											
	#1 Crime / Incident(s) 9910 - WARRANT SERVICE		<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete		At Found Month: 10 Day: 22 Yr: 2018 Time: 20:15 Hrs																																																																																											
	#2 Crime Incident		<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete		Location of Incident 52 DAISY LN, HENDERSON, NC 27537																																																																																											
MO	#3 Crime Incident		<input type="checkbox"/> Attempt <input checked="" type="checkbox"/> Complete		Premise Type 01 - Home of Victim - Single Family Dwelling																																																																																											
	How Attacked or Committed BY ATTEMPTING TO SERVE A WARRANT		Forcible <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Weapon / Tools <input type="checkbox"/> N/A																																																																																											
	# of Victims 1		Type: <input type="checkbox"/> Person <input type="checkbox"/> Business <input type="checkbox"/> Society <input type="checkbox"/> Government <input type="checkbox"/> Financial Institute <input type="checkbox"/> Religious <input type="checkbox"/> L.E. Officer Line of Duty <input type="checkbox"/> Other/Unk		Injury: <input type="checkbox"/> None <input type="checkbox"/> Minor <input type="checkbox"/> Loss of Teeth <input type="checkbox"/> Broken Bones <input type="checkbox"/> Severe Lacerations <input type="checkbox"/> Internal <input type="checkbox"/> Unconscious <input type="checkbox"/> Other Major																																																																																											
	Victim/Business Name (Last, First, Middle) STATE OF NORTH CAROLINA		Victim of Crime # 1		DOB / Age 1																																																																																											
VICTIM	Home Address		Race		Sex																																																																																											
	Employer Name/Address		Relationship To Offender		Resident Status																																																																																											
	VYR		Make		Model																																																																																											
	Style		Color		Lic/Lis																																																																																											
OTHERS INVOLVED	CODES: V = Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)																																																																																															
	Type: <input type="checkbox"/> Person <input type="checkbox"/> Business <input type="checkbox"/> Society <input type="checkbox"/> Government <input type="checkbox"/> Financial Institute <input type="checkbox"/> Religious <input type="checkbox"/> L.E. Officer Line of Duty <input type="checkbox"/> Other/Unknown																																																																																															
	Code		Name (Last, First, Middle)		Victim of Crime #																																																																																											
	R		WHITE, J J		1																																																																																											
	Home Address		Race		Sex																																																																																											
	Employer Name/Address		Relationship To Offender		Resident Status																																																																																											
	Type: <input type="checkbox"/> Person <input type="checkbox"/> Business <input type="checkbox"/> Society <input type="checkbox"/> Government <input type="checkbox"/> Financial Institute <input type="checkbox"/> Religious <input type="checkbox"/> L.E. Officer Line of Duty <input type="checkbox"/> Other/Unknown		Code		Name (Last, First, Middle)																																																																																											
	R		WELBORN, C M		1																																																																																											
	Home Address		Race		Sex																																																																																											
	Employer Name/Address		Relationship To Offender		Resident Status																																																																																											
Status Codes (Check "OJ" column if recovered for other jurisdiction) L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found																																																																																																
PROPERTY	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>Victim #</th> <th>DCI</th> <th>Status</th> <th>Value</th> <th>OJ</th> <th>QTY</th> <th>Property Description</th> <th>Make/Model</th> <th>Serial Number</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>						Victim #	DCI	Status	Value	OJ	QTY	Property Description	Make/Model	Serial Number																																																																																	
	Victim #	DCI	Status	Value	OJ	QTY	Property Description	Make/Model	Serial Number																																																																																							
Number of Vehicles Stolen 0 Number of Vehicles Recovered 0																																																																																																
ID	Officer Name DEPUTY J. J. WHITE		ID# 259		Officer Signature 																																																																																											
	Complainant Signature		Supervisor Signature 		Case Disposition:																																																																																											
	<input checked="" type="checkbox"/> Further Investigation <input type="checkbox"/> Inactive <input type="checkbox"/> Closed/Cleared <input type="checkbox"/> Closed/Leads Exhausted		<input type="checkbox"/> Unfounded <input type="checkbox"/> Juvenile/No Custody <input type="checkbox"/> Extradition Declined <input type="checkbox"/> Cleared by Arrest <input type="checkbox"/> Refuse to Cooperate <input type="checkbox"/> Located <input type="checkbox"/> Cleared by Arrest by Another Agency <input type="checkbox"/> Death of Offender <input type="checkbox"/> Prosecution Declined		Page 1 of 5																																																																																											

INCIDENT/INVESTIGATION REPORT

Page 2

OCA
18013870

Status Codes		L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found												
DRUGS	DCI	Status	Quantity	Type Measure	Suspected Type				Check up to 3 types of activity for each					
									Possess	Buy	Sale	Mfg.	Importing	Operating
OFFENDER	Offender Used Alcohol/Drugs		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A		Offender 1								Primary Offender Resident Status	
	Computer		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A		Age: 41 Race: B Sex: F				Age: Race: Sex:				<input type="checkbox"/> Resident <input type="checkbox"/> Non-Resident <input type="checkbox"/> Unknown	
SUSPECT	Name (Last, First, Middle)				Alias or Nickname				Home Address					
	OLIVER, LATWANYA SHAWNTEL				LATWANYA L OLIVER ; LATWANYA SHA				52 DAISY LANE, HENDERSON, NC 27537					
	Occupation				Business Address									
					PACIFIC COAST FEATHERS - 100 COMFORT DR, Henderson, NC 27536									
	DOB / Age		Race	Sex	Height	Weight	Build	Hair Color	Hair Style	Hair Length	Eye Color	Glasses		
	02/05/1977 41		B	F	5'07"	275		BRO	STR	LNG	BRO	Yes		
	Scars, Marks, Tattoos, or other distinguishing features (i.e. limp, foreign accent, voice characteristics)													
	Hat	Jacket	Shirt/Blouse	Tie/Scarf	Coat/Suit	Pants/Dress/Skirt	Socks	Shoes						
	Was Suspect Armed?		Type of Weapon				Direction of Travel				Mode of Travel			
	VYR	Make	Model	Style	Color	Lic/Lie	Vin							
WITNESS	Name (last, first, middle)				DOB / Age		Race	Sex	OCA					
	Home Address				Home Phone		Employer		Phone					
	Suspect Hate / Bias Motivated: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>													
NARRATIVE	Narrative													
	CFS # 1810-049445													
	MSHEARIN6865 - 2018-10-22 20:22:50													
	S33ADV SEND HIM SOME UNITS AT HIS LOCATION													
	MSHEARIN6865 - 2018-10-22 20:24:56													
	S33 IS REQUESTING EMS 10-18 TRAFFIC REF USE OF FORCE													
	JCROTTY9997 - 2018-10-22 20:39:55													
	OLIVER, LATWANYA SHAWNTEL 02/05/1977 BLACK FEMALE 26617872 NC 52 DAISY LN													
	HENDERSON, NC 27537-3095 239-25-2354 VANCE													
	17CR53133 WARRANT FOR ARREST OBTAIN PROPERTY FALSE PRETENSE NO NO NCAWARE ELECTRONIC													
	98 OLIVER, LATWANYA SHAWNTEL 02/05/1977 BLACK FEMALE 26617872 NC 52 DAISY LN													
	HENDERSON, NC 27537-3095 239-25-2354 VANCE													
	17CR53134 WARRANT FOR ARREST OBTAIN PROPERTY FALSE PRETENSE NO NO NCAWARE ELECTRONIC													
	CAD Disposition = B ARREST MADE													
	On 10-22-18, 2016 hours, I notified dispatch of a warrant service at 52 Daisy Lane, Henderson, NC 27537. I knocked on the front door and													
	I heard a female ask, who is it? I identified myself as Deputy White with the Vance County Sheriffs Office. The female asked again, who is it?													
	I re-advised the aforementioned. The female stated, I don't believe you, shine your light so I													

CONTINUATION PAGE

1. AGENCY VANCE COUNTY SHERIFF'S OFFICE	2. ORI NC0910000	3. CONTINUATION TO: <input checked="" type="checkbox"/> INVESTIGATION <input type="checkbox"/> ARREST <input type="checkbox"/> SUPPLEMENTARY INV.	4. OCA FILE NO. 18013870
<p>Narrative</p> <p>can see you. I adhered to her request and she said, oh ok and opened the front door. The female turned out to be Ms. Latwanya Shawntel Oliver, who was wanted on 2 felony counts of obtaining property by false pretense. Prior to going to the residence, I asked dispatch to verify the felony warrants and they advised same were active. I told Ms. Oliver she had felony warrants and she stated, Lawd, what have I done-I aint done nothing wrong. I stated, you are under arrest and will find out further at the magistrates office. Ms. Oliver stated, I haven't done nothing-can I call my daughter and let her know. I told her she can make a phone call at the station. She said, well, ok, let me get my keys, turn off my lights, lock up my house and stuff. Can I do that? Because you are just ugh. I replied, yes, you can do that. Ms. Oliver turned off some of her lights and walked out of the front door and I asked, aren't you going to lock up and she turned around and said, I forgot, let me get my keys of the dresser and she said we are going to have to go out of the back door because something is wrong with the front door. When we walked out of the back door, she did not pull it all the way through and I pulled it for her and asked, do you have a deadbolt key and she said yes but something is wrong with it. As she was approaching my patrol vehicle, I told her to stop and submit to the handcuffs. She replied, why do you have to handcuff me? I told her it is for my safety as well as yours (standard procedure). I was able to get one handcuff on her and she became irate and would not comply with my lawful orders. She screamed to the top of her lungs help, help, help me-your not taking me anywhere until' I see some papers-I'm not going anywhere. I told her to calm down and that she was making the situation worst. I told her cooperation goes along way with law enforcement when you go before the magistrate or judge. Ms. Oliver stated, ok, sir, I apologize. I went to handcuff the second arm and she went crazy, she lost it. She pulled away from me while saying no, no, I'm not going, leave me alone. I placed her up against my car, opened the rear passenger door instructed her to get in and she became extremely combative by yelling no, I'm not going no where, help, help. She pushed her body against mines and striked me in the lower leg twice. I performed a takedown maneuver, which is an approved subject control technique. To prevent additional manipulation of the handcuffs, I tightened them while on the ground. Ms. Oliver stated, you broke my arms, oooowwwwww, oooowwwwww my arms are killing me, they are hurting sir, I think my arms are sprained, I'm in so much pain. I immediately radioed for EMS 10-18 due to injuries sustained from a use of force (2024 hours). Prior to, I called for back up at 2022 hours. Sgt. Welborn arrived on scene first as back up and I told him, she has felony warrants, refused to comply, pulled away and assaulted me. EMS arrived and stated, her arm is not broke because she can move her shoulders. Ms. Oliver continued to scream in pain and the EMS Supervisor re-examined her arm and said, yep, it is broken. Ms. Oliver was transported to Maria Parham Hospital in Henderson, NC for further medical treatment. I acted in good faith to arrest Ms. Oliver and when she refused I took action as authorized. I used reasonable force to achieve the law enforcement objective and to gain compliance and to ensure public safety. I afforded her every opportunity to comply with my lawful orders and she refused. I do not have a taser and pepper spray would have been ineffective as she was moving uncontrollably and had glasses on, which would have caused same to ricochet (more likely than not). Officer presence and verbalization did not work. Thus, I had to go hands on. I made a good faith effort to maintain and restore order. I followed the objective reasonableness standard under the 4th Amendment to arrest the defendant and to seize her person due to the outstanding felony warrants notwithstanding other violation of law (assault on a law enforcement officer and resisting arrest). It should be noted, Ms. Oliver has a record of communicating</p>			
Officer Name / ID DEPUTY J. J. WHITE - 259	Officer Signature 	Date / Time Submitted 10-23-18 / 0900 hrs	Page 3 of 5

DCI-602 F

REV 3/92

CONTINUATION PAGE


1. AGENCY VANCE COUNTY SHERIFF'S OFFICE	2. ORI NC0910000	3. CONTINUATION TO: <input checked="" type="checkbox"/> INVESTIGATION <input type="checkbox"/> ARREST <input type="checkbox"/> SUPPLEMENTARY INV.	4. OCA FILE NO. 18013870
---	----------------------------	---	------------------------------------

Narrative

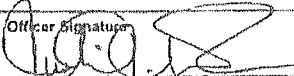
threats, simple assault and assault with a deadly weapon (aggravating factors on her part and mitigating factors for me). Ms. Oliver filed a verbal frivolous complaint against me for pulling her over and harrasing her at the Shell Gas Station on Warrenton Road. I did not pull her over, I never turned on my lights and sirens. I noticed a car traveling at a high rate of speed on North Garnett Street passing Parker and Bickett Streets, Old Norlina Road and Spring Valley Drive. On 10-21-2018, 2130 hours approximately, I was patrolling Old Norlina Road going towards Main Street (the intersection of Garnett, Beckford, Main, Chestnut). The vehicle was clearly exceeding safe speed. I brought my vehicle up to 60 mph and had trouble keeping up with her in a 35 MPH Zone. It was not until' she almost rear-ended a dark in color truck at the Handy Mart beside Forsyth Skippers that she slowed down but picked the speed right back up. It should be noted, she has a horrible DMV record, 15 speeding tickets, various running a red light/stop signs and several accidents. Had I known this at the time, I would have pulled her and took appropriate action. I ran the tag, which came back active and valid. I asked dispatch to run the registered owner for warrants, which came back negative. Ms. Oliver pulled into the Shell Gas Station and I pulled around to the Carey Chapel Road entrance for the station and saw her exit the vehicle (FFS-2692) and told her to slow it down and to watch her speed. I was trying to have open dialogue with her (community oriented policing) and she started screaming and yelling for no reason, I know my rights, you should have pulled me back there and wrote the ticket, I know my rights. I advised her it was not to late to write the ticket but I'm trying to talk to you about not speeding in the future. She said, well, write the ticket then and you have a good day. Due to dispatch failing to properly do a warrant check (public safety issue), I was unaware she had felony warrants. It is unfortunate that injuries occurred, however, I have a job to do and the general welfare of the public is first and violators must be apprehended pursuant to standard operating procedures, general statue, common law and judicial precedent (state and federal case law). See Use of Force Report. This is an account of what happened and I reserve the right to amend this statement (addendum) as the situation happened so quickly.

SUPPLEMENT #3 SGT. C. M. WELBORN - 170 10/23/2018 04:37

ON 10-22-2018, I RESPONDED TO 52 DAISY LANE REFERENCE DEPUTY WHITE CALLING FOR ASSISTANCE. WHILE ENROUTE DEPUTY WHITE CALLED FOR EMS EMERGENCY TRAFFIC REFERENCE TO USE OF FORCE AND EMS WOULD BE TOLD MORE ONCE ON SCENE. WHEN I ARRIVED ON SCENE VANCE COUNTY EMS WAS ALREADY ON SCENE. WHEN I ARRIVED I NOTICE A BLACK FEMALE LAYING ON THE GROUND HANDCUFFED AND SHE WAS IDENTIFIED AS LATWANYA OLIVER. SHE WAS HOLLERING STATING HER ARM WAS BROKE. I ASKED DEPUTY WHITE WHAT HAPPENED AND HE STATED HE ATTEMPTED TO SERVE MRS. OLIVER WITH FELONY WARRANTS. DEPUTY WHITE STATED MRS. OLIVER STARTED RESISTING AND BECAME COMBATIVE KICKING HIM TWICE. DEPUTY WHITE STATED HE TOOK HER TO THE GROUND AND HANDCUFFED HER. DEPUTY WHITE STATED HE CALLED FOR ASSISTANCE AND EMS. VANCE COUNTY EMS FIRST STATED MRS. OLIVER ARM WAS NOT BROKEN THEN CHIEF OVERTON STATED HER ARM WAS BROKEN. MRS. OLIVER WAS TRANSPORTED TO MARIA PARHAM MEDICAL CENTER FOR FURTHER TREATMENT. WHEN I ARRIVED AT THE HOSPITAL I SPOKE WITH MRS. OLIVER. SHE STATED THAT DEPUTY WHITE WAS HARASSING HER. SHE STATED DEPUTY WHITE FOLLOWED HER ON SUNDAY FROM JOHN FOSTER HOMES UNTIL SHE PULLED INTO S&N FOOD MART ABOUT EIGHT OR NINE OCLOCK ON 10-21-2018. MRS. OLIVER STATED DEPUTY WHITE UP TO HER IN THE PARKING LOT TELLING HER ABOUT HER SPEEDING. SHE STATED WRITE ME A TICKET BECAUSE I KNOW MY RIGHTS. MRS.

Officer Name / ID DEPUTY J. J. WHITE - 259	Officer Signature 	Date / Time Submitted 10-23-18 / 0600h's	Page <u>4</u> of <u>5</u>
--	--	--	------------------------------

CONTINUATION PAGE

1. AGENCY VANCE COUNTY SHERIFF'S OFFICE	2. ORI NC0910000	3. CONTINUATION TO: <input checked="" type="checkbox"/> INVESTIGATION <input type="checkbox"/> ARREST <input type="checkbox"/> SUPPLEMENTARY INV.	4. OCA FILE NO. 18013870
<p>Narrative</p> <p>OLIVER STATED DEPUTY THEN CAME TO HER RESIDENCE AFTER MIDNIGHT BANGING ON THE FRONT AND SIDE DOOR. MRS. OLIVER STATED SHE DID NOT LOOK TO SEE WHO IT WAS BUT KNEW IT WAS DEPUTY WHITE. MRS. OLIVER STATED DEPUTY WHITE CAME BACK TO HER RESIDENCE LATER AND STATED YOU HAVE A WARRANT. MRS. OLIVER STATED SHE LOCKED THE DOOR AND WALKED TO THE CAR. MRS. OLIVER STATED SHE ASKED TO SEE THE WARRANT. MRS. OLIVER STATED WHEN SHE GOT TO THE PATROL VEHICLE AND SHE DID NOT GET IN BECAUSE SHE WAS SCARED. MRS. OLIVER STATED SHE TOLD DEPUTY WHITE TO CALL FOR SOMEONE ELSE. SHE STATED DEPUTY WHITE PUSHED HER INTO THE PATROL VEHICLE WHEN SHE REFUSED TO GET IN. SHE STATED SHE WAS NOT HANDCUFFED AND DEPUTY WHITE SLAMMED HER TO THE GROUND. SHE STATED WHILE ON THE GROUND DEPUTY WHITE HANDCUFFED HER. I SPOKE WITH CHIQUITA MARROW MRS. OLIVER SISTER (252) 432-0289 AND SHE STATED DEPUTY WHITE CAME TO THE RESIDENCE AFTER MIDNIGHT KNOCKING ON BOTH DOORS AND NOBODY WENT TO THE DOOR AND NOBODY LOOKED OUT TO SEE HIM. MRS. OLIVER WAS SERVED WITH THE TWO FELONY WARRANTS AND THE CHARGES FOR OBSTRUCTING OF JUSTICE AND ASSAULT ON LAW ENFORCEMENT OFFICER. SHE WAS GIVEN A \$15,000.00 UNSECURED BOND PER MAGISTATE COWAN. MRS. OLIVER WAS GIVEN A COURT DATE OF 11-19-2018.</p>			
Officer Name / ID DEPUTY J. J. WHITE - 259	Officer Signature 	Date / Time Submitted 10-73-18 / 10:00 hrs	Page 5 of 5

P. White Order Re. Canine Dave

VANCE COUNTY SHERIFF'S OFFICE
EMPLOYEE COUNSELING RECORD

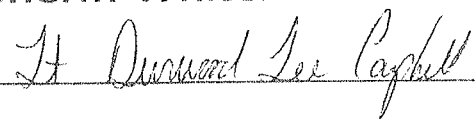
DATE: 08/20/2018

TIME: 17:00 PM

EMPLOYEE: DEPUTY ADAM HIGHT


Due to the circumstances of the K-9 incident involving K-9 Dave today at the school nutrition warehouse, you are hereby instructed that going forward until further training can be conducted and K-9 Dave satisfactorily certified, you are not to bring K-9 Dave to work. K-9 Dave is to be kept at home secured in his kennel at all times unless you are exercising the dog. Any work conducted with K-9 Dave outside of the kennel shall be ON LEAD until further notice. At no time should K-9 Dave be outside his confines without physical control of the K-9 with actual leads. Per Sheriff White.


EMPLOYEE SIGNATURE _____ DATE _____

 08/20/18
SUPERVISOR SIGNATURE _____ DATE _____

Am. EEOC Compl.

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> Amended 433-2018-03289 </div> </div>	
and EEOC			
<i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Miss) Mr. Justin J. White		Home Phone (incl. Area Code) (919) 961-3448	
Street Address 130 Chappell Lane,		City, State and ZIP Code Kittrell, NC 27544	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name VANCE COUNTY- OFFICE OF THE SHERIFF		No. Employees, Members 500 or More	
Street Address 156 Church Street, Suite 004,		City, State and ZIP Code Henderson, NC 27536	
Name 		No. Employees, Members 	
Street Address 		City, State and ZIP Code 	
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap;"> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> OTHER (Specify) UNLAWFUL WORKPLACE HARASSMENT</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest Feb. 20, 2018 Oct. 24, 2018 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)). <p>I. During my employment with the above named employer, I have been the victim of harassment and differential treatment as it pertains to the terms and condition of employment in comparison to that of my non- Black coworkers/Deputy Sheriffs. This involves, but not limited to the areas of Discipline, Corrective Actions, Treatment, Disrespect, Issuance of Safety Equipment, Subordinate Status and Retaliation.</p> <p>II. I have not been provided with any reason(s) for the harassment or the difference in treatment concerning the areas on the part of the Respondent.</p> <p>III. I believe that I have been discriminated against based on my Race, Black, my gender, male, and in retaliation for my taking part in a protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			
Page 1 of 5			

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.	NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
Nov 7 th , 2018 Date	 Charging Party Signature

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐

FEPA

Amended☒

EEOC

433-2018-03289

and EEOC

State or local Agency, if any

1. On 10-18-17, 5:30 p.m., Sgt. Bobby Martin, white male, made several sexual discriminatory comments & jokes towards me in front of others. 2 hours later, he asked me in front of others if he could talk to me & pulled me aside & apologized. He kept apologizing for the situation saying, I have a slick mouth & sometimes I get carried away. I should not have said those things about you & I'm sorry, I don't really know you but maybe you can give me another chance to get to know you. I asked him, what are you talking about? & he said, the gay jokes, you know what I said earlier. I replied, ok. His apology is an admission of responsibility as my alleged and or perceived sexuality does not have a thing to do with him or any other staff member.

2. On 11-22-17, 8:47 p.m., I was notified by Lt. Durwood Campbell, white male, that I was being transferred from Sgt. Donald Roberson, white male, to Sgt. Myron Alexander, black male, shift effective next week. Deputy Burns, white male, and I were being switched. Lt. Campbell advised me this was because of Dep. Burns starting basic law enforcement training in January 2018. On 11-30-17, 4:00 a.m., I was notified by Sgt. Alexander that my transfer was for personal issues with Dep. Wayne, black male, because we were beefing, not backing each other up on calls, weren't getting along, so Captain Lloyd Watkins, black male & Lt. Campbell asked me to take you. Sgt. Alexander stated, I had the option of not taking you.

On 12-2-17, 12:00 a.m., Sgt. Roberson was filling in for Sgt. Alexander & I asked him about my shift transfer. Sgt. Roberson stated, when I returned from vacation, Lt. Campbell called me in his office & said, we are going to make some changes because White & Wayne aren't getting along. Sgt. Roberson asked, were they not getting along when I was gone? Lt. Campbell replied, D-Ray they don't get along when you are here.

Sgt. Roberson advised me that Chief Bullock, black male, asked him on 12-1-2017, where is White. Sgt. Roberson stated, I told him that you were transferred to Sgt. Alexander's shift. Sgt. Roberson stated, Chief Bullock advised that he did not know about nor did he approve it & that Watkins or Campbell better not do it again without his or the sheriff's approval. No one questioned me or Dep. Wayne on any conflict between us prior to the transfer. 12-2-2017, 6:23 p.m., I found a purple in color female unicorn hat in my mailbox. This is a form of sexual harassment. I reported same to Sgt. Roberson & Lt. Goolsby. No action.

3. On 2-20-18, 6:00 p.m., I was suspended over lies told by Lt. Durwood Campbell for being insubordinate to him, Sgt's. Alexander & Roberson after I gave a white female a criminal summons for several traffic violations. I was falsely accused by Lt. Campbell. I never participated in the original investigation or the re-investigation pertinent to my suspension. During my suspension meeting, I asked twice to see my personnel file & Chief Bullock denied my request. The disciplinary was one sided.

4. On 6-8-18, 6:30 p.m., Sgt. Welborn, white male, asked me to sign a performance evaluation done by Sgt. Alexander on 6-1-18 and I refused because it was false/fabricated. I.t.

Page 2 of 5

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Nov 7th, 2018

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA**Amended**☒ EEOC**433-2018-03289**

and EEOC

State or local Agency, if any

Goolsby, black male, asked me to sign it twice after my initial refusal with Sgt. Welborn. After the false evaluation submitted by Sgt. Alexander, I filed an internal grievance appealing same & a race/gender discrimination complaint (false allegations of insubordination-suspension). After three attempts to get me to sign the false evaluations, management met with me & corrected majority of the evaluation problems.

5. On 9-10-18, 9:30 a.m., I was allowed to see my personnel file and I found two statements not previously known to me from Sgt. Roberson & Dep. Wayne, black male, in reference to traffic stops-related to my suspension on 2-20-18.

6. On 9-2-18, I again engaged in a protected activity when I filed EEOC charge number 433-2018-03289. One month thereafter, on 10-4-18, Sgt. Bobby Martin stated at the office during the meeting, Lt. Goolsby's ass does not want to answer calls, he fucking hides around the corner until another unit gets there but yet his bitch ass is the first one to get on the radio & make it seem like he is doing something! All he does is snitch & cause problems! It does not matter who the new sheriff is, his ass will not be a lieutenant! Also, Sgt. Martin verbally attacked me & falsely accused me of filing a complaint against him for repeatedly calling a subordinate Arab/Indian deputy, "Osama Bin Laden" a racially terroristic derogatory name in the presence of Lt. Goolsby, Sgt. Martin, Sgt. Welborn, Deputy Poole, Edwards, Clayton & Patel while in the patrol room. After the verbal attack, I contacted Capt. Watkins & filed complaint. Sgt. Martin came to my residence the following day at 5:30 p.m. & verbally apologized to me repeatedly saying, I was wrong & I'm man enough to admit being wrong, I should not have said those things, I'm Sorry Mr. White, I mean, and I'm just sorry man. He continued saying, Mr. White you are a good guy, you come to work, answer your calls & everyone else's calls, you do good reports, I would prefer to have you on my shift versus what I have now because you are dependable & you actually work.

Sgt. Martin was to receive a counseling form (lesser sanction which is a non-disciplinary written coaching). However, he rebutted the counseling form, inquired about who was the complaining party & said the counseling form is not valid & refused to sign. Sgt. Martin told me, Sheriff Peter White, S-I, said, I was being written up because Dep. White filed a complaint against you. Lt. Goolsby told me, Bobby was not written up, he refused to sign & Chief Dep L. Bullock said, if it comes up again then we will have to do what we have to & issue the write up. Sgt. Martin was not correctively disciplined for the discriminatory terroristic references made a multitude of times. I was lied on & my personal & professional character were defamed. Previously, Sgt. Martin addressed these issues with me in Aug, Sept & Oct 2018 & I denied filing a complaint. I was & still is offended by the terroristic discriminatory reference, multiple questionings & false allegations (harassment) of me filing a complaint. No disciplinary action (insubordination).

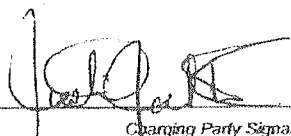
Page 3 of 5

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Nov 7th, 2018

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA**Amended**☒ EEOC**433-2018-03289**

and EEOC

State or local Agency, if any

7. On 10-6-18, 11:00 p.m., I met with Dep. Wayne & Dep. Poole at Sunrock in Kittrell, NC & discussed the document he wrote on me. Dep. Wayne denied writing the statement. However, his signed statement was dated 1-30-2018. Dep. Wayne continued to deny writing or signing anything against or about me. Dep. Wayne apologized to me for what took place but insisted he did not write any statements on me about the things I questioned him on, he never said or wrote. Dep. Poole can verify Dep. Wayne's full denial. He lied on me in writing & admitted it. Sgt. Roberson's statement dated 2-1-18 does merit some truth. Both statements are in reference to traffic stops, which were in my personnel file.
8. On 10-23-18, an African American female suspect reported to the employer (Chief - Bullock, Capt. Watkins & Capt. W Bullock) that I used excessive force & broke her arm while trying to effect an arrest. Later that afternoon, I was ordered to report to work because the sheriff wanted to talk to me. I never spoke with the sheriff. Instead, on October 23rd, 2018, Capt. W. Bullock met with Capt. Watkins & I. Capt. Bullock advised us he was conducting an administrative investigation in to the use-of-force & took my statement regarding the incident.
9. On 10-24-18, I was told by Capt. Bullock, that the Sheriff had determined that my services were no longer needed & to give me a ride home in my patrol car.
10. On 10-29-18, Dep. Poole notified me that Capt. Watkins told him that I was fired because they wrote the paperwork up as excessive force. I was not aware of same until then.
11. On 11-6-18, Dep. Poole notified me that Sgt. Martin said in the patrol room, all right now, you don't want to end up like your boy (seemingly referring to me getting dismissed). Dep. Poole said, if I get fired, I will find another job, everybody know White was fired because the Sheriff has a personal vendetta against him. Sgt. Welborn stated, here you go with that yall shit again.
12. To my knowledge, no one else engaged in a protected activity & no one else was correctively disciplined or discharged similarly for alleged policy violations. To my knowledge, there have been other uses-of-force that have resulted in human fatalities, pet fatalities/injuries, broken arms, wrists/fingers & the deputies were not fired or disciplined.
13. In fact, a Caucasian K-9 officer, was not correctively disciplined or fired for his assigned k-9 (dog) viciously attacking a female subject without cause or order by the handler during the
- Page 4 out 5

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Nov 7th, 2018

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):



FEPA



EEOC

Amended**433-2018-03289**

and EEOC

State or local Agency, if any

Summer of 2018. All k-9 handlers are responsible for the actions of their assigned k-9 & the department must ensure appropriate training & continuing education & training for the handler & k-9. As a matter of fact, during the 2018 summer months, a white deputy kept leaving his patrol car on during day-shift after being told by Capt. Bullock not to do so back to back as he no longer had his dog after the attack. He was never issued insubordination paperwork. Also, a host of white supervisors & deputies were not correctively disciplined for violations of policy, some of them gross in nature but I, the black deputy was.

14. While the Office of the Sheriff is constitutional & traditionally powerful, it is not all powerful, checks & balances exist & the powers are derivative of general statute. While state agencies have sovereign immunity & localities or municipalities have government immunity, such immunity is not applicable to constitutional violations, negligence or gross negligence. There is a systemic pattern of discrimination at my former place of employment & legal corrective measures are needed to enjoin actors from continuing same. While the sheriff is the final policy maker of his department, subordinates have to follow orders of low, mid & upper level supervisors before it reaches the sheriff or face insubordination charges and if you object, management trumps up charges against staff. Also, the sheriff's decision-making does not outweigh civil rights or liberties pertinent to the color of law under 42 U.S.C Sect. 1983 of the Civil Rights Act.

15. I believe that I was discriminated against because of my race, Black, my sex, male, and retaliation for my engagement in the protected activity of filing EEOC charge #433-2018-03289 against the employer on 8-10-18 & prior internal grievances in June 2018, in violation of Title VII of the Civil Rights Act of 1964, as Amended. Also, I believe the terroristic discriminatory references & misconduct by certain members of the command staff created a hostile work environment. I was a dedicated deputy sheriff of the Vance County Sheriff's Office & put people first to accomplish the law enforcement objective & did not deserve to be fired. I desire to be made whole by the County of Vance, The Office of the Sheriff i.e. reinstatement, compensated for back pay, allowed to fulfil my two year contract & etc. While I served at the pleasure of, I contend I was wrongfully dismissed based on the afore-mentioned merits. Also, I request a copy of my complete personnel file & use-of-force investigation file (any & all statements related).

Page 5 of 5

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Nov 7th, 2018

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

Not. Of Appt.



North Carolina Sheriffs' Education and Training and Standards Commission
North Carolina Department Of Justice Post Office Drawer 629
Raleigh, North Carolina 27602

Telephone: (919) 779-8213 Fax: (919) 662-4515

Report of Appointment - Form F-4 (revised 02/2014)



INSTRUCTIONS: Please type or print all information clearly. This form shall be completed for each individual irrespective of whether service is to be full-time, part-time, paid, unpaid, regular, reserve, auxiliary, honorary, or special. This appointment must be submitted to the Standards Division no later than 10 days after applicant has been appointed pursuant to 12 NCAC 10B .0403(a). A copy must be maintained in the appointing agency's personnel files.

Appointing Agency VANCE COUNTY SHERIFF'S OFFICE

Address 156 CHURCH STREET, SUITE 004--- HENDERSON, NC Zip Code 27536

Agency or ORI Number NC0910000

Phone Number (252) 738-2200

Appointee's Name: JUSTIN JAMEL WHITE
(First) (Middle) (Last)
Address 6606 CLARKSBURG PLACE-MAILBOX 12, RALEIGH NC Zip Code 27616

Date of Birth 08/15/ Operator's License Number 30643245

Gender: Male ☒ Female ☐
Race: African American ☒ Asian American ☐ Hispanic ☐ Caucasian ☐ Other ☐

Social Security Number ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

Deputy Sheriff ☒

Detention Officer ☐

Date of Oath 06/05/2017

Date of Appointment

Part Time ☐ Inactive ☐

Part Time ☐ Inactive ☐

Full Time ☒ Active ☒

Full Time ☐ Active ☐

Section for New Applicants, Probationary Appointees and Lateral Transfers

This section must be completed indicating that the requirements of the administrative code have been met with the necessary forms and documentation having been placed in the applicant's personnel file prior to submitting this application. Original substantiating documentation must be attached.

☒ Oath of Office (Required for Deputy Positions.)

☒ Fingerprint Requirement ☒ Submitted Directly to S.B.I./F.B.I.
☐ Submitted with application

☒ Authorization for Release of Information Form(s)

☒ F -1 Medical History Statement (valid for one year)
(Signed, and dated by Applicant and Licensed Physician, Nurse Practitioner or Physician's Assistant)

☒ F-2 and F-2a Medical Examination Report (valid for one year)
(Signed, and dated by Applicant and Licensed Physician, Nurse Practitioner or Physician's Assistant)

☒ Drug Screen Results (valid for 60 days)

☒ Education Requirement Verified By ☒ Diploma ☐ G.E.D. Report
☒ Transcript ☐ Other

☒ Firearms Qualification [Day/Night Handgun, Shotgun (if authorized), and Combat Course]

Deputy
Scores Enclosed ☒
Unauthorized ☐

Detention Officer
Scores Enclosed ☐
Unauthorized ☐

Perf. Appr. Rebut.

Justin Jamel White

HR on 6/28/18
1/3

130 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 • Justinwhitenessd@yahoo.com

June 15th, 2018

Transmitted via Hand Delivery

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536
Pwhite@vancecounty.org

Personnel Sensitive, Confidential & Sworn File

Re: Employee Performance Appraisal Rebuttal

Dear Sheriff

I, Justin J. White, deputy sheriff, hereby file rebuttal in reference to the aforementioned done by Sergeant Myron D. Alexander (S-12), Patrol Supervisor. Same was done on June 1st, 2018, 4 months approximately after I was transferred from his shift. I was notified of this document on June 8th, 2018, at 6 p.m. by Sgt. Chris M. Welborn (S-13), Patrol Supervisor & presented with same to sign in which I noted being in strong disagreement with. I shared my dissent with Sgt. Welborn, in which Sgt. Bobby Martin (S-11) was present & I was told to appeal it. Attached is a copy of my performance appraisal.

Sgt. Welborn advised me, JJ (me) you are a good employee, you work & you got some know how. Sgt. Welborn stated, this report is biased because Myron have personal issues with you. He advised me, you are a team player & professional with the citizens & us but I do get a little carried away from time to time but not too much. Sgt. Welborn claimed, JJ we all get a little carried away from time to time, it's going to happen. Sgt. Welborn stated, you are not insubordinate, you follow orders & do your job. Sgt. Welborn stated, go to the sheriff & talk to him.

Sgt. Bobby Martin advised me to file a rebuttal with the High Sheriff so it can be reviewed & removed from my file & if it was not overturned then for the rebuttal to be attached to the performance evaluation. Also, Sgt. Martin advised me that he had the same situation happen with a supervisor in investigations. Sgt. Martin claimed to have prepared a rebuttal & presented same to you & asked to be transferred since he could not satisfy his supervisor. Sgt. Martin won his case.

First & foremost, I am a stern & firm individual. I am shocked that Sgt. Alexander portrayed me negatively especially when he claimed that he did not have a problem with my job performance and or personal conduct in early January 2018 during a meeting with management, supervision & subordinates. Also, I have not been written up several times for my attitude & work ethics, nor have I been very insubordinate towards supervisors. Based on those deceptive & frivolous allegations, I request to view & copy my complete personnel file. It should be noted, I asked to see the file that Chief Bullock had when I was suspended in February 2018, in which I was denied & told, you have everything you need.

How can Sgt. Alexander adjudicate my performance or personal conduct when he does not show up to work on time & has been a no call no show on calls for service on various occasions with staff that have requested back up? He is the king of absenteeism & tardiness. In fact, he is the reason why a memo was issued 6-7 months ago for patrol to report to clock on at 5:30 and report to work at 5:45 & he does not adhere to same. Plenty of times, my supervisor & I waited for him to come to work & he would show up at 7 a.m. but his staff was on time. It is substantially rare for him to clock on on-time.

For example, Sgt. Alexander failed to report to work on time for 1 ½ hrs approximately, leaving me to answer calls in county alone & without back up, he gave Deputy I. Greene (trainee at-the-time) & Deputy T. Terry permission to come in late by using comp time. A burglary call (10-62 in progress) was assigned to me which was later downgraded to a prowler (10-76). Both calls for service were/are priority. The caller stated someone was trying to break into her residence & hung up. Then, she called back saying someone was trying to come through her window & that she heard them outside. I determined it was not a burglary or prowler but the wind causing the metal antenna & electric wires on her trailer to mimic same. In fact, day shift who was already off provided back up without my request since I was by myself. Sgt. Alexander was not appropriately disciplined for lying to Lt. Campbell (insubordination) claiming he was at work, when he was not, neglecting duty and failing to report as scheduled.

Deputy Branch (S-34) went to the sheriff's office on his day off a few months ago & met with Chief Bullock & Captain Watkins in reference to complaining on Sgt. Alexander pertinent to him not answering calls, not backing up deputies & not being accessible. As a matter of fact, Deputy Branch reported to management, supervision & co-workers that Sgt. Alexander was clearing calls after riding past the house & not stopping. Deputy Branch requested to be transferred to another shift & management told him to tough it out until the guys were out of training in May.

Deputy Poole (S-40) complained on Sgt. Alexander & wanted to be moved. In fact, on a call in January 2018, in which we had a burglary in progress call during the winter storm & Sgt. Alexander & Deputy Greene (S-41) were closer. Deputy Poole & I were near U.S. 1 S by the Franklin & Vance county line & we got there first & handled same despite them being on Warrenton road near U.S. 1. That incident triggered Deputy Poole's 10 day suspension, however, no one got on Myron for threatening Deputy Poole on the radio, you want to put your life on it in reference to who was closer to Regina Lane. Also, Sgt. Alexander, told Deputy Poole on the phone, I don't have to answer call because I am the supervisor.

Deputy Burns had problems with Sgt. Alexander not working & was constantly complaining on him to the Chief Bullock & Capt. Watkins. Also, former Deputy Lauren Matthews had a host of problems with Sgt. Alexander & was complaining.

According to supervision, every person that goes to his shift, either gets transferred or quits.

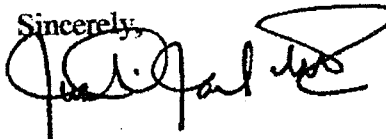
130 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 • jwhite@kittrell-nc.com

As a matter of recent fact, Deputy Al-Wadeii (S-28) worked Sgt. Alexander's shift f & was complaining to supervision on the other shift that he called for backup on Vicksboro Road & no one came but Deputy Edwards (S-24), who was the Northside car. Deputy Edwards stated he diverted from a call (pending) because Deputy Al-Wadeii called for help. Deputy Al-Wadeii claimed that Sgt. Alexander & Deputy Greene are always together.

As you can see, Sgt. Alexander has a history of unacceptable personal conduct and or grossly inefficient job performance. These matters needed attention. It is to my recommendation that Sgt. Alexander be suspended for 15 days without pay & demoted.

I look forward in hearing from you & resolving this matter internally.

Sincerely,

 6-20-18

Justin J. White, M.S., B.S.

Enclosures: (1)
Performance Appraisal

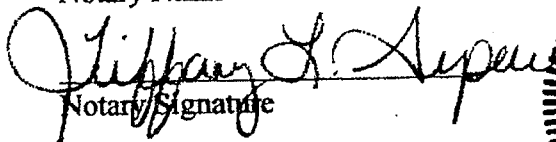
Cc: File
Argretta Johen, HR Director
Peter White, High Sheriff
Justin White, Deputy Sheriff
Chris Welborn, Sergeant
Bobby Martin, Sergeant

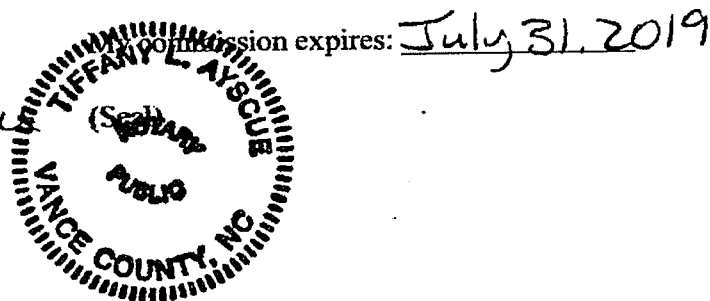
State of North Carolina
County of Vance

On this, the 20 day of June, 2018, before me a notary public, the undersigned party, personally appeared Justin J. White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.

Tiffany L. Ayscue
Notary Name


Notary Signature



J. White Title VII Compl.

June 15th, 2018Transmitted via Hand Delivery

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536

Personnel Sensitive, Confidential & Sworn File**Re: Title VII Civil Rights Act of 1964-Race & Gender Discrimination**

Dear Sheriff

I, Justin Jamel White, deputy sheriff at the Vance County Sheriff's Office, hereby file written complaint pertinent to race and gender discrimination.

On February 20th, 2018, I was written up and suspended for 5 days without pay, publicly humiliated by the department, having to walk out of the sheriff's office without a gun and badge and being stripped of my law enforcement credentials. On my way out, I encountered several deputy sheriffs, who saw me after the issuance of corrective action. **I was heavily lied on by Lt. Durwood Campbell (S-7) and no member of management seemed to care.**

Lt. Campbell is a Caucasian male and I am an African American male. Jamie Goss, Caucasian female, called and complained which triggered this entire ordeal despite me being in the performance of my job duties and responsibilities. My main duty is to answer calls, patrol the county, observe and enforce violations of law/county ordinances. It should be noted, On June 5th, 2018, Ms. Goss pled guilty. **It is going to be too late to correct someone's action when he or she and innocent third parties are tragically killed as a result of a motorist illegally gross decisions under the wheel.** I am happy to discuss the incidents involving this in the near future.

I was never given a chance to share my side in reference to providing verbal or written statement in reference to the deceptively egregious allegations by Lt. Durwood Campbell. Per Sheriff White, Chief Lawrence Bullock and Captain Watkins were directed to get my side of the story before corrective action was issued. **That did not happen.** {It should be noted, this is not the first instance of insubordination with Chief Bullock and Captain Watkins as the Sheriff directed both of them to put me back on Sgt. Roberson's (S-10) shift in December 2017 and January 2018. This is because the shift transfer was not approved by the High Sheriff nor was it submitted to the Chief Deputy for review and submission for approval to the Sheriff. Also, the Sheriff did not delegate authority to Capt. Watkins or Lt. Campbell to transfer staff}. No one talked to me about anything. Out of the blue, I walk in and is suspended over hot lies. It should be noted, Chief Bullock and Capt. Watkins were insubordinate to the Sheriff by not getting my take on the situation. **Based on mere appearance, the County of Vance, NC and Sheriff Office took the white man's word over the black man.** Same is a civil rights violation.

Lt. Campbell cursed, fussed & threatened me in the presence of third parties. The first time, Deputy Poole was present in the patrol room & the second time, Sgt. Alexander & Deputy Poole were present (patrol room). I am happy to discuss the incidents involving this in the near future.

I have direct evidence of both situations and look forward to presenting same. I believe we may be able to rectify this situation administratively. My pay check was docked 911.00 dollars and 28 hours of overtime went down the drain over lies and errors by management. It should be noted, the sheriff's office nor HR will not receive copies of my evidence. If the situation goes to trial in a federal court of competent jurisdiction i.e. EEO and or state court of competent jurisdiction i.e. defamation of character, libel and slander, negligence, then it will be provided during discovery as ordered by the courts.

It should be noted, there is a pattern of discrimination and negligence at the sheriff's office. Upon hire, I begged Lt. Ray Shearin (S-4) for a bullet proof vest for 3 weeks and was only given one after I approached the command staff while they were reading reports in late June 2017 and Captain W.W. Bullock (S-3) ordered him to find me a vest. I responded to emergency calls i.e. burglary in progress, no vest.

From late June 2018 until August 2018, I begged for tires on my patrol vehicle to no avail for nearly 8 weeks. I followed the chain of command, Sgt. Roberson (S-10), Lt. Shearin and former Captain now Chief, L.D. Bullock (S-2) requesting tires. Sgt. Roberson eventually told me to stop asking and go to the sheriff because these people don't do their jobs. As I was going to see the Sheriff, Capt. Bullock asked what's wrong? (After I walked in his office for the third time) and where is your car? He saw the car and went to Lt. Shearin and I got some tires same day despite both of them knowing I needed tires prior to. The metal wires were showing on rear tires.

Last July 2017, Deputy Warren Durham (S-95) heard a bullet ricochet off of his vehicle on Breckenridge Street, near the jail and feared for his life. That was the same night that former Deputy Erik Sheftal (S-29) held a suspect at gun point in the city limits of Henderson by the library. Deputy Durham had previously asked Lt. Shearin for a vest to no avail.

In January 2018, Deputy Al-Wadeii (S-28) was responding to calls without a vest with Lt. Campbell and I questioned him being on the streets without a vest. Lt. Campbell called Lt. Shearin and he came to the sheriff's office and issued him a vest (speedily despite my situation).

It should be noted, Lt. Shearin is a Caucasian male and the parties listed above are minorities. This is a civil rights issues. Also, Lt. Shearin was directed by the High Sheriff to issue me equipment i.e. in September 2018 twice to no avail

While I serve at the pleasure of, I contend these issue do not fit the criteria as they would reasonably violate county and or departmental policy, federal civil rights laws, NC Public Policy Doctrine, NC Tort Law, etc. Also, taking adverse action against someone after reporting the aforementioned is reprisal and or retaliation. How can one write up, suspend and dock pay of the black man but the same alleged offenses are being committed by white deputies? How can one

write up, suspend and dock pay of subordinate but allow other supervisory or managerial deputies to get away with it? How can the subordinate deputy be suspend for insubordination & the chief deputy, captain & lieutenant are not held to the same standard for being insubordinate?

*******SOMETHING IS WRONG WITH THIS PICTURE & NEEDS CORRECTING*******

It is to my recommendation that Chief Bullock be issued a corrective action and suspended for 10 days without pay in reference to insubordination by not returning me to Sgt. Roberson's shift and not obtaining statements for the allegations made by Lt. Campbell.

It is to my recommendation that Capt. Watkins receive a lesser sanction as the chief deputy had the overall responsibility as the manager with rank/seniority to ensure my transfer back to Sgt. Roberson's shift and that they met with me about the allegations by Lt. Campbell.

It is to my recommendation that Lt. Shearin be issued corrective action and suspended for 10 days without pay and demoted in reference to failing the issue the protective and necessary law enforcement equipment after being directed to do so by the Sheriff several times.

It is to my recommendation that Lt. Campbell be issued corrective action, suspended for 10 days without pay & demoted for his official misconduct & verbal/written deception pertinent to the write up.

I understand it will be difficult in disciplining members of your command staff but as you said in times past, we have to be fair.

There were no legitimate non-discriminatory reasons to issue corrective action and authorize adverse action. There are no bona-fide reasons and or business necessity for the abovementioned. Even if responsibility laid with me, then the mixed motive legal theory would apply.

I look forward in hearing from you and resolving this issue.

Sincerely,

Justin White, M.S., B.S

Jw *Jw* 4-22-2018

Cc: File

Argretta Johen, HR Director

Peter White, High Sheriff

Justin White, Deputy Sheriff

[Signature]

6/22/2018

2 Pages

State of North Carolina
County of Vance

On this, the 22nd day of June, 2018, before me a notary public, the undersigned party, personally appeared [Signature], known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.

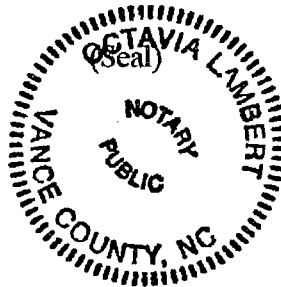
[Signature]

Notary Name

[Signature]

Notary Signature

My commission expires: July 2, 2020



P. White Resp. to Perf. Appr. Rebut.

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

July 13, 2018

Deputy Justin J. White
156 Church Street, Suite 004
Henderson, NC 27536

Dear Deputy White:

This letter is being written in response to your "Performance Appraisal Rebuttal" dated June 15, 2018 and received by me on June 26, 2018. After reviewing your Performance Appraisal on June 13, 2018, completed by Sergeant Myron D. Alexander and dated on June 1, 2018, I instructed the Sergeant, through the chain of command to re-visit the appraisal form in which you indicated that you "strongly disagree" with the ones rated "1".

Sergeant Alexander completed a subsequent appraisal dated June 20, 2018 changing a rating of "1" in the dimension of Interpersonal Skills/Teamwork from a "1" to the rating of "2" which increased your total score by 1, which changed your total from 19 to 20. This particular form indicates that you refused to sign. This adjustment was made because you had only been reprimanded once instead of "several times" as previously listed for this dimension.

In an effort to resolve you disagreeing and refusing to sign the appraisal form, I requested that this appraisal be re-visited once more. This time since you had been supervised by both Sergeant M. D. Alexander and Sergeant C. M. Welborn nearly an equal amount of time during this review period, the review would involve you and both Sergeants which was completed and dated July 2, 2018 and reviewed by me on July 3, 2018. This time your rating of 1 in the dimension of Dependability Attendance was adjusted from a "2" to a "3". This change left you with a total score of 23 which is standard. Your file is maintained in my office and you're welcome to review same. The other incidents you mentioned in your "Rebuttal" have no bearing on your Performance Appraisal.

Sincerely,

Sheriff Peter White

PW/jbm

P. White Resp. to Title VII Compl.

Office of the Sheriff

Vance County

156 Church Street, Suite 004
Henderson, North Carolina 27536-5574

Telephone 252-738-2200
Fax 252-738-2220



Sheriff Peter White

July 19, 2018

Deputy Justin J. White
156 Church Street, Suite 004
Henderson, NC 27536

Dear Deputy White:

This letter is being written in response to your complaint dated June 15, 2018 and received on June 26, 2018. In your complaint you reference "Title VII Civil Rights Act of 1964-Race & Gender Discrimination".

You were in fact suspended for five (5) days without pay beginning February 20, 2018, which included the working days February 20, 25, 26, 27 and 28 which is documented on the Personnel Action Form which you signed on February 20, 2018. This suspension as you know was for unbecoming conduct as listed on the Personnel/Payroll Action Form signed by you on February 20, 2018.

Yes, your gun and badge were kept here as well as your credentials (ID) which is customary during suspension periods. In this regard, you were treated no different than anyone else. There is no evidence that Lieutenant Campbell "heavily lied" on you as you stated in your complaint.

If you will recall, when you and I met after your suspension period ended, you admitted to saying the things to Lieutenant Campbell that he listed in the official written reprimand signed by you and he on February 20, 2018.

In regard to the Jamie Goss complaint, you had been told previously by Supervisors not to issue a criminal summons for a traffic violation or violations which was the basis of the Goss complaint, since she was served nearly 24 hours after the traffic stop. You had also been told not to focus on traffic stops since this is not your primary duty and you had not been issued a citation book. Ms. Goss was originally charged with Reckless Driving to Endanger, Driving Left of Center and a Seat Belt violation. On June 5, 2018, she pled guilty to one count of Improper Equipment while the other charges were dismissed. This is not a Caucasian/African American issue but simply you as a Deputy Sheriff with the Vance County Sheriff's Office doing what you are told and following instructions. When you made this vehicle stop knowing you were not able to issue a citation, you should have contacted a Supervisor on Duty instead of you issuing a criminal summons.

You were given a chance to "share your side" when you met with Chief L. D. Bullock, Captain L.Q. Watkins and Lieutenant D. Campbell. During this meeting, you denied making the statement listed in the reprimand dated January 27, 2018 and signed by you and Lieutenant Campbell.

In your capacity as a Deputy Sheriff, you do not get to say who on my Command Staff is "Insubordinate" to me and who is not. As Sheriff, that is my decision.

You began your Field Training on June 18, 2018 with the Sergeant Durwood Campbell. During your third week of training, you and two other trainees were rotated to different squads with you being assigned to Sergeant D. R. Roberson's squad to complete your training with Deputy Brian Wayne. You remained on this squad throughout your training and until November 2017. Due to issues within this squad you were then reassigned to the squad supervised by Sergeant Myron D. Alexander where you remained until your suspension on February 20, 2018. After returning from your suspension imposed by me, you were assigned to another squad supervised by Sergeant C. M. Welborn where you remain today.

The one rotation and two re-assignments to different squads had absolutely nothing to do with race, gender or anything else other than simply trying to place you where you would best fit and be of greater benefit to the Sheriff's Office.

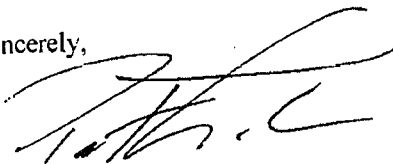
Once again, this is not a RACE, SEX or GENDER ISSUE nor any other form of discrimination. Lieutenant Campbell has admitted that he was angry with you during the telephone conversation and does not deny using the word "ass" while speaking with you, which is obviously inappropriate on his part. This has been addressed by me with Lieutenant Campbell. However, this does not excuse your conduct displayed while addressing a Superior Officer (Lieutenant Campbell) in the Patrol Squad Room.

Your suspension was approved by me based on your conduct in the Patrol Squad Room in the presence of Lieutenant Campbell, whom you were addressing, Sergeant Alexander and Deputy Poole. The suspension was carried out and Nine Hundred Eleven Dollars (\$911.00) was deducted from your pay.

I have not seen nor am I aware of any discrimination in the Vance County Sheriff's Office.

The incidents you alleged in your complaint involving other deputies and equipment issued is by no means discrimination. In addition, each of these deputies you mentioned is perfectly capable of speaking for themselves. In summary, I see nothing in your Complaint nor during this investigation to suggest discrimination in any shape, form or fashion.

Sincerely,



Sheriff Peter White
PW/jbm

Notice of EEOC Charge

NOTICE OF CHARGE OF DISCRIMINATION
(This Notice replaces EEOC FORM 131)

DIGITAL CHARGE SYSTEM

September 12, 2018

To:

Mrs. Argretta Johen
Director, Human Resources
VANCE COUNTY
AJOHEN@vancecounty.org

This is notice that a charge of employment discrimination has been filed with the EEOC against your organization by Justin White, under: Title VII of the Civil Rights Act (Title VII). The circumstances of the alleged discrimination are based on Retaliation, Race, and Sex, and involve issues of Harassment, Discipline, and Terms/Conditions that are alleged to have occurred on or about Feb 20, 2018 through Aug 10, 2018.

The Digital Charge System makes investigations and communications with charging parties and respondents more efficient by digitizing charge documents. The charge is available for you to download from the EEOC Respondent Portal, EEOC's secure online system.

Please follow these instructions to view the charge within ten (10) days of receiving this Notice:

1. Access EEOC's secure online system: <https://nxcg.eeoc.gov/rsp/login.jsf>
2. Enter this EEOC Charge No.: 433-2018-03289
3. Enter this temporary password: nh5275qy

Once you log into the system, you can view and download the charge, and electronically submit documents to EEOC. The system will also advise you of possible actions or responses, and identify your EEOC point of contact for this charge.

If you are unable to log into the EEOC Respondent Portal or have any questions regarding the Digital Charge System, you can send an email to Raleigh@eeoc.gov.

Preservation of Records Requirement

EEOC regulations require respondents to preserve all payroll and personnel records relevant to the charge until final disposition of the charge or litigation. 29 CFR §1602.14. For more information on your obligation to preserve records, see <http://eeoc.gov/employers/recordkeeping.cfm>.

Non-Retaliation Requirements

The laws enforced by the EEOC prohibit retaliation against any individual because s/he has filed a charge, testified, assisted or participated in an investigation, proceeding or hearing under these laws. Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made. For more information, see <http://www.eeoc.gov/laws/types/facts-retal.cfm>.

Legal Representation

Although you do not have to be represented by an attorney while we handle this charge, you have a right, and may wish to retain an attorney to represent you. If you do retain an attorney, please provide the attorney's contact information when you log in to the online system.



**U.S. Equal Employment Opportunity Commission
FEDERAL INVESTIGATION:
REQUEST FOR POSITION STATEMENT
AND SUPPORTING DOCUMENTARY EVIDENCE**

EEOC hereby requests that your organization submit within 30 days a Position Statement setting forth all facts which pertain to the allegations in the charge of discrimination under investigation, as well as any other facts which you deem relevant for EEOC's consideration.

We recommend you review EEOC's resource guide on "Effective Position Statements" as you prepare your response to this request.

Fact-Based Position Statement

This is your opportunity to raise any and all defenses, legal or factual, in response to each of the allegations of the charge. The position statement should set forth all of the facts relevant to respond to the allegations in the charge, as well as any other facts the Respondent deems pertinent to EEOC's consideration. The position statement should only refer to, but not identify, information that the Respondent asserts is sensitive medical information, or confidential commercial or financial information.

EEOC also requests that you submit all documentary evidence you believe is responsive to the allegations of the charge. If you submit only an advocacy statement, unsupported by documentary evidence, EEOC may conclude that Respondent has no evidence to support its defense to the allegations of the charge.

EEOC may release your position statement and non-confidential attachments to the Charging Party and her representative and allow them to respond to enable the EEOC to assess the credibility of the information provided by both parties. It is in the Respondent's interest to provide an effective position statement that focuses on the facts. EEOC will not release the Charging Party's response, if any, to the Respondent.

If no response is received to this request, EEOC may proceed directly to a determination on the merits of the charge based on the information at its disposal.

Signed by an Authorized Representative

The Position Statement should be signed by an officer, agent, or representative of Respondent authorized to speak officially on its behalf in this federal investigation.

Segregate Confidential Information into Separately Designated Attachments

If you rely on confidential medical or commercial information in the position statement, you should provide such information in separate attachments to the position statement labeled "Sensitive Medical Information," "Confidential Commercial or Financial Information," or "Trade Secret Information" as applicable. Provide an explanation justifying the confidential nature of the information contained in the attachments. Medical information about the Charging Party is not sensitive or confidential medical information in relation to EEOC's investigation. Segregate the following information into separate attachments and designate them as follows:

- a. Sensitive medical information (except for the Charging Party's medical information).
- b. Social Security Numbers
- c. Confidential commercial or financial information.

- d. Trade secrets information.
- e. Non-relevant personally identifiable information of witnesses, comparators or third parties, for example, social security numbers, dates of birth in non-age cases, home addresses, personal phone numbers and email addresses, etc.
- f. Any reference to charges filed against the Respondent by other charging parties.

Requests for an Extension

If Respondent believes it requires additional time to respond, it must, at the earliest possible time in advance of the due date, make a written request for extension, explain why an extension is necessary, and specify the amount of additional time needed to reply. Submitting a written request for extension of time does not automatically extend the deadline for providing the position statement.

Upload the Position Statement and Attachments into the Respondent Portal

You can upload your position statement and attachments into the Respondent Portal using the + **Upload Documents** button. Select the "Position Statement" Document Type and click the **Save Upload** button to send the Position Statement and attachments to EEOC. Once the Position Statement has been submitted, you will not be able to retract it via the Portal.

Please retain this notice for your records.

Notice of Confidentiality: The information contained in this transmission may contain privileged and confidential information, including information protected by federal and state privacy laws. It is intended only for the use of the person (s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact us at digital-support@eeoc.gov and destroy all copies of the original message and attachments.

J. White Susp.

**VANCE COUNTY
PERSONNEL / PAYROLL ACTION FORM**

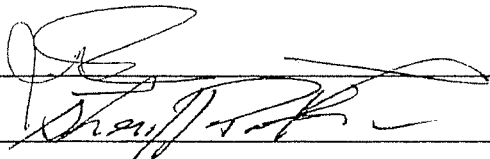
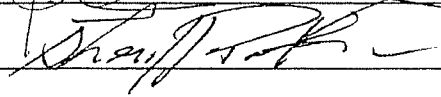
☐ New Hire/Rehire ☒ Change ☐ Leave of Absence ☐ Termination ☐ Other

Effective Date: 02/20/2018 Date of Hire: _____
Name: JUSTIN WHITE SSN: _____
Address: _____ Marital Status: _____
City/State: _____ Sex: _____ Race: _____
Zip/County: _____ Date of Birth: _____
Department: SHERIFF'S OFFICE
Job Title: DEPUTY SHERIFF Grade: _____ Job #: _____
Monthly/Hourly Rate: _____ Annual Salary: _____

Explanation: UNBECOMING CONDUCT --SUSPENDED FIVE (5) DAYS WITHOUT PAY---
FEBRUARY 20, 25, 26, 27, 28 TO RETURN ON MARCH 1, 2018

SHERIFF & 911 ONLY: *Please check all that apply. Provide a date and a copy of the certification.*

☐ Sheriff Department-BLET Certified: _____ ☐ 911-EMD Certified: _____

Employee Signature:  Date: 2-20-18
Department Head Signature:  Date: 2-20-18
Human Resources Signature: _____ Date: _____
Payroll Signature: _____ Date: _____

This instrument has been pre-audited in the manner required by the Local Government Budget & Fiscal Control Act
Approved by Finance Director: _____ Date: _____

HUMAN RESOURCES USE ONLY			
<i>Please check all that apply and attach the appropriate forms.</i>			
DEDUCTIONS:	<input type="checkbox"/> Employee - Medical	<input type="checkbox"/> Employee - Dental	<input type="checkbox"/> Employee - Life
ATTACH THE FOLLOWING FORMS:	<input type="checkbox"/> Federal & State Tax Forms	<input type="checkbox"/> Direct Deposit Info	<input type="checkbox"/> Longevity
Completed By: _____		Date: _____	

VANCE COUNTY SHERIFF'S OFFICE
OFFICIAL WRITTEN REPRIMAND

DATE: 01/27/18

EMPLOYEE NAME: JUSTIN J WHITE

Has Employee been verbally reprimanded? YES

Has employee been counseled? NOT FOR THIS ISSUE

Is Employee willing to make necessary changes? I CAN NOT
ANSWER

REF: OFFICER COMPLAINT, INSUBORDINATION TO ME AND FOR
DEFYING PREVIOUS INSTRUCTION ON TRAFFIC MATTERS.

RECORD OF EMPLOYEE CONVERSATION:

SATURDAY MORNING JAN 27,2018 AT 9:30AM, I CALLED
DEPUTY JJ WHITE. THIS WAS IN RESPONSE TO AN OFFICER COMPLAINT
CALL I HAD JUST GOTTEN AT HOME FROM SGT. ALEXANDER FROM A
JAMIE GOSS. SHE WAS VERY UPSET AT THE FACT THAT SHE WAS
SERVED WITH A SUMMONS FOR TRAFFIC VIOLATIONS ALMOST 24
HOURS AFTER THE TRAFFIC STOP, IN WHICH SHE WAS RELEASED. I
INFORMED HIM THAT HE HAD NO BUSINESS GOING BACK SERVING
CRIMINAL SUMMONS FOR TRAFFIC VIOLATIONS ON PEOPLE BECAUSE
HE WAS NOT ISSUED A CITATION BOOK. HE JUMPED BACK AT ME
TELLING ME I WAS BEING DISRESPECTFUL TO HIM AND NOT GOING TO
TALK TO HIM THAT WAY. I TOLD HIM HIS PRIMARY JOB FUNCTION WAS

NOT TRAFFIC ENFORCEMENT AND HE WAS NOT TO DO THAT AGAIN. I THEN TOLD HIM TO HAVE A GOOD DAY AND HUNG UP.

LATER IN THE DAY, WE WERE ALL IN THE PATROL ROOM AND I HEARD A CONVERSATION BETWEEN SGT. ALEXANDER AND POOLE AND WHITE THAT WAS GETTING HEATED, SO I STEPPED OUT OF MY OFFICE TO LISTEN. POOLE WAS TELLING SGT. ALEXANDER THAT HE DID NOT UNDERSTAND WHY THE SITUATION BETWEEN THEM HAD GOTTEN AS FAR AS IT DID. HE FELT THAT THE SHIFT SHOULD BE ABLE TO TALK "MAN TO MAN" AND IT STAY THERE. THE PROBLEM IS IT APPEARS THEIR IDEA OF MAN TO MAN IS THEY TELL THE SUPERVISORS WHAT THEY ARE GOING TO DO AND IT BE DROPPED. I HAD NOT SPOKEN UP SO FAR I WAS JUST LISTENING AND MAKING SURE IT DID NOT GET OUT OF HAND.

THEN DEP. WHITE STOOD UP AND SPOKE TO ME SAYING HE DID NOT APPRECIATE THE WAY I SPOKE TO HIM THIS MORNING. HE RATTLED OFF FOR SEVERAL MINUTES AND THEN I TOOK A TURN. I ASKED HIM DID HE HAVE A TICKET BOOK AND HE SAID NO. I THEN REITERATED THAT THE REASON HE DID NOT HAVE ONE WAS BECAUSE HIS PRIMARY JOB DESCRIPTION WAS NOT TRAFFIC ENFORCEMENT, IT WAS TO SERVE PAPERS AND ANSWER CALLS. I THEN MENTIONED HIS LACK OF WARRANT SERVICES THAT DIDN'T INCLUDE HIS TRAFFIC SUMMONS. HE THEN SAID HE COULDN'T HELP NO ONE WAS COMING TO THE DOOR AND THAT HE DID WARRANT SERVICES. THEN HE SAID HE ONLY HAD ONE FATHER AND HE WAS A LARGE BLACK MAN AND EVEN HE DIDN'T TELL HIM WHAT TO DO ANYMORE. HE THEN SAID THAT THE DECISIONS HE MADE ABOUT HOW TO DO HIS JOB WERE HIS DECISIONS AND WON'T NOBODY GOING TO TELL HIM WHAT TO DO. AND THEN HE MADE A REFERENCE TO KNOW KNOWING WHY I WAS CALLED "DIRTY

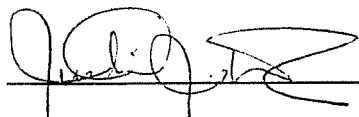
SOUP". I HAVE NEVER HEARD ANYONE REFERENCE ME IN THAT MANNER BEFORE. HE SAID ON THAT NOTE I'M OUT AND STOMPED OUT OF PATROL.

INCLUDED IS A COPY OF MY COUNSELING FORM I PREPARED, AS WELL AS ALL OF WHITE'S ARREST REPORTS FOR THE LAST MONTH. THERE IS ONLY ONE THAT I CAN DETERMINE WAS AN ACTUAL SERVICE ATTEMPT. THE REMAINING ARREST REPORTS ARE ALL FROM TRAFFIC STOPS IN WHICH HE HAD CRIMINAL SUMMONS ISSUED FOR TRAFFIC VIOLATIONS. ONE OR TWO HAD ADDITIONAL WARRANTS, BUT THOSE ALSO HAD HIS OWN TRAFFIC CHARGES. I THEN PRINTED OFF THE CAD REPORT FOR HIM. SINCE DECEMBER 15, MOST OF THE WARRANT CHECKS ON THERE ARE HIS SUMMONS HE SERVED FOR THE TRAFFIC VIOLATIONS OR SUBPOENAS. I RECOGNIZE THE ADDRESSES AS ONES I HAD SUBPOENAS ON. THERE WAS EVEN ONE WITH 10 C-CHARLES CLEAR CODES. THAT WAS SUBPOENAS HE WAS RIDING AROUND IN HIS CAR TWO WEEKS AFTER THEY EXPIRED SO HE DID RETURNS.

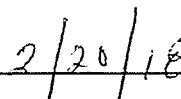
I HAD DEPUTY WHITE THE FIRST TWO WEEKS OF FIELD TRAINING. IT WAS CLEARLY EXPLAINED TO HIM IN FIELD TRAINING THAT TRAFFIC ENFORCEMENT WAS NOT A TOP PRIORITY AS HE SEEMED TO WANT TO "GO GET" EVERY MINOR TRAFFIC VIOLATION WE OBSERVED. IT WAS ALSO PREVIOUSLY DISCUSSED BETWEEN SGT. ROBERSON AND DEPUTY WHITE AFTER HE WAS ASSIGNED TO A-SHIFT THAT HE NEEDED TO CEASE STOPPING CARS BECAUSE THE MAJORITY OF HIS STOPS WERE IN THE CITY AND HE KEPT ASKING OTHER PEOPLE TO COME WRITE TICKETS OR ASSIST BECAUSE HE COULD NOT CHARGE PEOPLE.

THIS PRACTICE OF STOPPING CARS AND THEN GOING BACK
ISSUING SUMMONS IS IN VIOLATION OF PREVIOUS ORDERS GIVEN TO
HIM TO CEASE TRAFFIC ENFORCEMENT.

IT IS MY RECOMMENDATION THAT HE BE SUSPENDED WITHOUT
PAY FOR WHATEVER AMOUNT OF TIME THE SHERIFF FEELS
APPROPRIATE.

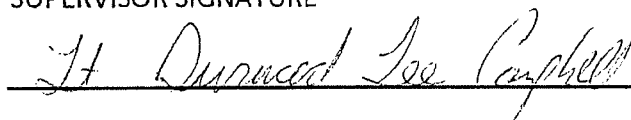


EMPLOYEE SIGNATURE (acknowledging receipt of Reprimand)



DATE

SUPERVISOR SIGNATURE



DATE



Campbell Stat. re. J. White Traff.

SHERIFF WHITE

REF DEP J J WHITE

06/18/ 2017 BEGAN FIELD TRAINING WITH SGT. D L CAMPBELL. IN THE THIRD WEEK OF TRAINING (AROUND JULY 4 HOLIDAY) ALL THREE TRAINEES WERE ROTATED DUE TO AN ISSUE UNRELATED TO WHITE. HE WAS MOVED TO A-SQUAD UNDER SGT. ROBERSON AND FIELD TRAINING WAS COMPLETED BY DEP. B. WAYNE. DEP. WHITE REMAINED ON THIS SHIFT THROUGHOUT FIELD TRAINING AND WHEN RELEASED UP UNTIL 11/29/2018. BASED UPON SOME ISSUES WITHIN THE SHIFT DEP WHITE WAS MOVED TO B-SQUAD UNDER SGT. MYRON ALEXANDER. HE REMAINED ON B-SQUAD UNTIL AN INCIDENT OCCURRED THAT CAUSED HIS SUSPENSION ON FEB 20, 2018. UPON RETURNING FROM HIS SUSPENSION, HE WAS ASSIGNED TO D-SQUAD UNDER SGT. C. WELBORN WHERE HE HAS REMAINED SINCE.

AS PER THE QUESTION OF JAMIE GOSS I WENT BACK AND RESEARCHED AND FOUND THAT SHE WAS ORIGINALLY CHARGED WITH RECKLESS DRIVING TO ENDANGER, NO

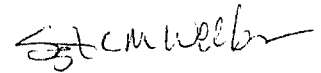
SEAT BELT AND LEFT OF CENTER. THE CHARGES OF RECKLESS DRIVING TO ENDANGER AND SEAT BELT WERE DISMISSED, AND SHE PLEADED TO ONE COUNT OF IMPROPER EQUIPMENT IN LIEU OF LEFT OF CENTER (06/05/2018).

LT. D. L. CAMPBELL

Welborn Stat. re. Appr. Rebut.

RECEIVED
7-1-18

DEPUTY WHITE AND I SPOKE ABOUT HIS PREFORMANCE EVALUATION. DEPUTY WHITE STATED HE WAS NOT SATISFIED WITH THE WAY HIS EVALUATION WAS DONE BY SGT. ALEXANDER. I ADVISED DEPUTY WHITE TO SPEAK TO THE SHERIFF ABOUT THIS SINCE HE WAS NOT SATISFIED. DEPUTY WHITE STATED HE WAS GOING TO TALK TO THE SHERIFF AND THEN TO HUMAN RESOURCES. I ADVISED DEPUTY WHITE THAT HE NEEDED TO TALK TO THE SHERIFF.


SGT. CM WELBORN

Martin Stat. re. Appr. Rebut.

RELIEVED
7-1-18

ON THE DATE AND TIME IN QUESTION DEP. J. WHITE CAME TO ME REQUESTING TO KNOW WHAT HE SHOULD DO IN REGARD TO HIS PERFORMANCE EVALUATION HE RECEIVED FROM SGT. ALEXANDER. I SPOKE TO DEP. WHITE AND ADVISED HIM TO WRITE A LETTER AND REQUEST FOR IT TO BE PLACED IN HIS PERSONAL FILE ALONG WITH THE EVALUATION. THE REASON FOR THIS IS IF SOMEONE ELSE REVIEWED THE EVALUATION THEY WOULD ALSO BE ABLE TO READ HIS OPINION OF WHY HE RECEIVED THE SCORE HE DID. I TOLD DEP. J. WHITE TO MAKE SURE HE SPOKE WITH THE SHERIFF ABOUT HIS SITUATION.



SGT. B. C. MARTIN

July 18, 2018

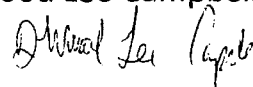
Statement regarding accusation made by Dep. J.J. White.

On Monday July 16, 2018, I was contacted by Capt. Watkins and requested to write a statement in reference to the previous incident involving Dep. White and myself from back in January.

The specific accusation was that I told Dep. White "didn't I tell your ass not to do that anymore and I will take care of your ass when I get to work". This conversation took place about six months ago, and I did not copy down word for word what was said, but I do remember being quite angry with him that morning over continued defiance of instructions given to him to stop taking out criminal summons on people he encountered for every little thing he saw. I do not remember the specific wording I used during that conversation, nor can I deny that as upset as I was I did not say that either.


As for the incident in the Sheriff's office later in the day, I did not say anything initially. I overheard a conversation taking place in the patrol room that was getting heated between Dep. White, Poole and Sgt. Alexander. I stepped out into the room just to see what was going on and Dep. White then began making statements to me. Dep. White got up from his seat, and started walking toward me making verbal and hand gestures, but then stopped. There was a heated exchange between us as well, but I do not remember using any specific foul language toward him while addressing him.

Durwood Lee Campbell

A handwritten signature in black ink, appearing to read "Durwood Lee Campbell", written in a cursive style.

On the date in question I and Sgt. Alexander were discussing problems on our shift when we got through with the discussion. Lt. Campbell and Deputy White started arguing. Deputy White told Lt. Campbell that I respect you but you are not going to talk to me any kind of way. Lt. Campbell stated I have told several times and Sgt. Roberson has told you we do not do criminal summons on traffic matters. Deputy White replied you was not there I did was right in that situation if I would not have acted she could have killed someone. Lt. Campbell replied are you state trooper the answer is no. Deputy White stated look ⁱⁿ my father is a big black man and even he do not talk to me and disrespect me like this I am the only that has defended you when everyone in the department calls you dirty soup I say you ~~are~~ ^{are} the best training officer we got but I am done with this conversation and Deputy White got up and left.

Signed: Andre Poole


07-18-18



Vance County EMPLOYEE PERFORMANCE APPRAISAL (VC-2016)

NAME JUSTIN WHITE	DEPARTMENT PATROL DIVISION
TITLE PATROL DEPUTY	DATE IN POSITION 6/5/2017
SUPERVISOR SGT. M. ALEXANDER/ SGT. C. WELBORN	REVIEW PERIOD From: 6/2017 To: 6/2018

PERFORMANCE/JOB FACTORS At the beginning of the performance period, review the job description and responsibilities of the position with the employee. At the end of the period, assess the individual's performance for each factor listed by selecting the appropriate rating. Use the comment section to provide supporting details.

1 = Below Standard (Needs improvement; performance is inconsistent; some counseling and documentation needed for this score)

2 = Standard (Fully meets requirements; adheres to County and Department policies)

3 = Above Standard (Occasionally exceeds requirements)

Performance/Job Factors	Rating	Comments
Job Knowledge/Skills The application of technical skills and procedural knowledge displayed in performing the basic job responsibilities. The degree of understanding of the operations, practices and procedures relating to one's job.	2	
Quality Consider the accuracy, completeness, and acceptability of the work/service provided relative to defined or generally acceptable standards, policies, guidelines, etc.	2	
Productivity Consider the amount or quantity of work produced as well as how efficiently time, material, or other resources are utilized in performing the duties and responsibilities of the job.	3	Deputy White normally has all of his work completed by the end of each work period and stays on task with each of his assignments.
Public Relations Presents positive image and impression to public; is courteous and responds to questions/phone calls timely and with accuracy.	2	
Interpersonal Skills/Teamwork The ability to interact effectively with co-workers and supervisors to build rapport and foster teamwork. The degree to which one is a team player. The support and cooperation given to others in order to achieve common goals and objectives.	2	
Initiative/ Motivation The degree of self-directed action, independence and resourcefulness displayed in accomplishing work assignments. The willingness to go beyond the basic job requirements.	2	
Communication Skills The ability to express oneself clearly both orally and/or in writing. The degree of effectiveness in communicating with co-workers and supervisors on issues/problems relating to one's job or department.	1	Deputy White sometimes speaks to the citizens and other co-workers with a very nasty attitude.
Flexibility/Adaptability The ability to apply one's skills and knowledge to a variety of tasks and assignments. The willingness to accept and adjust to changes in the work environment; learn new skills, processes or procedures. The ability to utilize skills (current and new) to gain efficiency and improve one's productivity in carrying out basic job requirements.	2	
Safety Performance Complies with Safety Program Policy and Procedures. Shows willingness to participate in safety program activities.	2	
Dependability/Attendance The extent to which an employee follows County policy. Is punctual, observes prescribed work breaks/meal periods, and maintains a solid overall attendance record.	3	Deputy White attends work each day, never calls out and reports to work on time each day he is scheduled to work.

21

≈ Total Score

UNIQUE CONTRIBUTIONS/ACCOMPLISHMENTS Use this section to describe extraordinary contributions or accomplishments which occurred during this review period and should be considered in the overall assessment of performance.

OVERALL PERFORMANCE RATING Check the appropriate performance rating box below to indicate the employee's overall level of performance during the performance review period. Consider your assessment of the performance/job factors and any unique contributions/accomplishments noted.

Look at the scale below and select the category for the Overall Performance Rating.

- ☐ Score is 10 – 14 - Below Standard – Does not meet the Performance/Job Factors; Supervisor needs to establish Performance Improvement Plan
- ☐ Score is 15 – 23 - Standard – Meets most of the Performance/Job Factors
- ☐ Score is 24 - 30 - Above Standard – Exceeded all or most of the Performance/Job Factors

IMPROVEMENTS/ENHANCEMENTS/CAREER DEVELOPMENT

Identify the type of training program, course work, or special projects/assignments that would be beneficial to employee to improve or enhance the skills required in the current position.

Deputy White needs to improve his attitude and learn to follow direct orders from his immediate supervisor. Enhance communication skills and continue to improve in learning his normal job duties as a deputy within his career.

OUTCOMES/GOALS FOR NEXT REVIEW PERIOD. These outcomes/goals are unique for this employee's responsibilities and may differ from other employees with the same title. Make sure they are specific, measurable, achievable, realistic, and tangible. Use back side of this page and additional sheets if needed.

1. DCI certification training

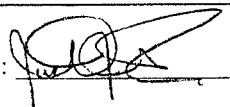
2. CJ Leads training and certification

3.

4.

PERFORMANCE APPRAISAL COMMENTS


Employee's Comments Attach additional page (if required) *Will do*

Employee Signature: 


Date: 7-2-2018

Signature indicates only that contents have been reviewed with the employee and does not imply agreement or disagreement.

Signatures

Immediate Supervisor: 

Date: 7/2/18 - 7/3/18

Department Head: 

Date: 7/2/18



Vance County

EMPLOYEE PERFORMANCE APPRAISAL (VC-2016)

NAME JUSTIN WHITE	DEPARTMENT PATROL DIVISION	
TITLE PATROL DEPUTY	DATE IN POSITION 6/5/2017	
SUPERVISOR SGT. M. ALEXANDER/ SGT. C. WELBORN	REVIEW PERIOD	From: 6/2017 To: 6/2018
<p>PERFORMANCE/JOB FACTORS At the beginning of the performance period, review the job description and responsibilities of the position with the employee. At the end of the period, assess the individual's performance for each factor listed by selecting the appropriate rating. Use the comment section to provide supporting details.</p> <p>1 = Below Standard (Needs improvement; performance is inconsistent; some counseling and documentation needed for this score)</p> <p>2 = Standard (Fully meets requirements; adheres to County and Department policies)</p> <p>3 = Above Standard (Occasionally exceeds requirements)</p>		
Performance/Job Factors	Rating	Comments
Job Knowledge/Skills The application of technical skills and procedural knowledge displayed in performing the basic job responsibilities. The degree of understanding of the operations, practices and procedures relating to one's job.	2	
Quality Consider the accuracy, completeness, and acceptability of the work/service provided relative to defined or generally acceptable standards, policies, guidelines, etc.	2	
Productivity Consider the amount or quantity of work produced as well as how efficiently time, material, or other resources are utilized in performing the duties and responsibilities of the job.	3	Deputy White normally has all of his work completed by the end of each work period and stays on task with each of his assignments.
Public Relations Presents positive image and impression to public; is courteous and responds to questions/phone calls timely and with accuracy.	2	
Interpersonal Skills/Teamwork The ability to interact effectively with co-workers and supervisors to build rapport and foster teamwork. The degree to which one is a team player. The support and cooperation given to others in order to achieve common goals and objectives.	2	
Initiative/ Motivation The degree of self-directed action, independence and resourcefulness displayed in accomplishing work assignments. The willingness to go beyond the basic job requirements.	2	
Communication Skills The ability to express oneself clearly both orally and/or in writing. The degree of effectiveness in communicating with co-workers and supervisors on issues/problems relating to one's job or department.	1	Deputy White sometimes speaks to the citizens and other co-workers with a very nasty attitude.
Flexibility/Adaptability The ability to apply one's skills and knowledge to a variety of tasks and assignments. The willingness to accept and adjust to changes in the work environment; learn new skills, processes or procedures. The ability to utilize skills (current and new) to gain efficiency and improve one's productivity in carrying out basic job requirements.	2	
Safety Performance Complies with Safety Program Policy and Procedures. Shows willingness to participate in safety program activities.	2	
Dependability/Attendance The extent to which an employee follows County policy. Is punctual, observes prescribed work breaks/meal periods, and maintains a solid	3	Deputy White attends work each day, never calls out and reports work on time each day he is scheduled to work.

21

≈ Total Score

UNIQUE CONTRIBUTIONS/ACCOMPLISHMENTS Use this section to describe extraordinary contributions or accomplishments which occurred during this review period and should be considered in the overall assessment of performance.

OVERALL PERFORMANCE RATING Check the appropriate performance rating box below to indicate the employee's overall level of performance during the performance review period. Consider your assessment of the performance/job factors and any unique contributions/accomplishments noted.

Look at the scale below and select the category for the Overall Performance Rating.

- ☐ Score is 10 – 14 - Below Standard – Does not meet the Performance/Job Factors; Supervisor needs to establish Performance Improvement Plan
- ☐ Score is 15 – 23 - Standard – Meets most of the Performance/Job Factors
- ☐ Score is 24 - 30 - Above Standard – Exceeded all or most of the Performance/Job Factors

IMPROVEMENTS/ENHANCEMENTS/CAREER DEVELOPMENT

Identify the type of training program, course work, or special projects/assignments that would be beneficial to employee to improve or enhance the skills required in the current position.

Deputy White needs to improve his attitude and learn to follow direct orders from his immediate supervisor. Enhance communication skills and continue to improve in learning his normal job duties as a deputy within his career.

OUTCOMES/GOALS FOR NEXT REVIEW PERIOD. These outcomes/goals are unique for this employee's responsibilities and may differ from other employees with the same title. Make sure they are specific, measurable, achievable, realistic, and tangible. Use back side of this page and additional sheets if needed.

1. DCI certification training

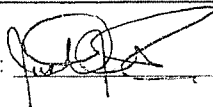
2. CJ Leads training and certification

3.

4.

PERFORMANCE APPRAISAL COMMENTS

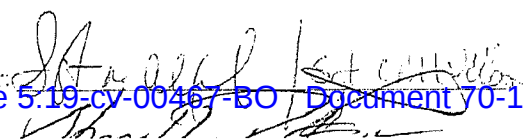
Employee's Comments Attach additional page (if required) *Will do*

Employee Signature: 

Date: 7-2-2018

Signature indicates only that contents have been reviewed with the employee and does not imply agreement or disagreement.

Signatures

Immediate Supervisor: 

Date: 7/2/18 - 7/12/18

130 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 •

June 15th, 2018

Transmitted via Hand Delivery

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536

Personnel Sensitive, Confidential & Sworn File

Re: Title VII Civil Rights Act of 1964-Race & Gender Discrimination

Dear Sheriff

I, Justin Jamel White, deputy sheriff at the Vance County Sheriff's Office, hereby file written complaint pertinent to race and gender discrimination.

On February 20th, 2018, I was written up and suspended for 5 days without pay, publicly humiliated by the department, having to walk out of the sheriff's office without a gun and badge and being stripped of my law enforcement credentials. On my way out, I encountered several deputy sheriffs, who saw me after the issuance of corrective action. **I was heavily lied on by Lt. Durwood Campbell (S-7) and no member of management seemed to care.**

Lt. Campbell is a Caucasian male and I am an African American male. Jamie Goss, Caucasian female, called and complained which triggered this entire ordeal despite me being in the performance of my job duties and responsibilities. My main duty is to answer calls, patrol the county, observe and enforce violations of law/county ordinances. It should be noted, On June 5th, 2018, Ms. Goss pled guilty. **It is going to be too late to correct someone's action when he or she and innocent third parties are tragically killed as a result of a motorist illegally gross decisions under the wheel.** I am happy to discuss the incidents involving this in the near future.

I was never given a chance to share my side in reference to providing verbal or written statement in reference to the deceptively egregious allegations by Lt. Durwood Campbell. Per Sheriff White, Chief Lawrence Bullock and Captain Watkins were directed to get my side of the story before corrective action was issued. **That did not happen.** {It should be noted, this is not the first instance of insubordination with Chief Bullock and Captain Watkins as the Sheriff directed both of them to put me back on Sgt. Roberson's (S-10) shift in December 2017 and January 2018. This is because the shift transfer was not approved by the High Sheriff nor was it submitted to the Chief Deputy for review and submission for approval to the Sheriff. Also, the Sheriff did not delegate authority to Capt. Watkins or Lt. Campbell to transfer staff}. No one talked to me about anything. Out of the blue, I walk in and is suspended over hot lies. It should be noted, Chief Bullock and Capt. Watkins were insubordinate to the Sheriff by not getting my take on the situation. **Based on mere appearance, the County of Vance, NC and Sheriff Office took the white man's word over the black man.** Same is a civil rights violation.

Lt. Campbell cursed, fussed & threatened me in the presence of third parties. The first time, Deputy Poole was present in the patrol room & the second time, Sgt. Alexander & Deputy Poole were present (patrol room). I am happy to discuss the incidents involving this in the near future.

I have direct evidence of both situations and look forward to presenting same. I believe we may be able to rectify this situation administratively. My pay check was docked 911.00 dollars and 28 hours of overtime went down the drain over lies and errors by management. It should be noted, the sheriff's office nor HR will not receive copies of my evidence. If the situation goes to trial in a federal court of competent jurisdiction i.e. EEO and or state court of competent jurisdiction i.e. defamation of character, libel and slander, negligence, then it will be provided during discovery as ordered by the courts.

It should be noted, there is a pattern of discrimination and negligence at the sheriff's office. Upon hire, I begged Lt. Ray Shearin (S-4) for a bullet proof vest for 3 weeks and was only given one after I approached the command staff while they were reading reports in late June 2017 and Captain W.W. Bullock (S-3) ordered him to find me a vest. I responded to emergency calls i.e. burglary in progress. no vest.

From late June 2018 until August 2018, I begged for tires on my patrol vehicle to no avail for nearly 8 weeks. I followed the chain of command, Sgt. Roberson (S-10). Lt. Shearin and former Captain now Chief. L.D. Bullock (S-2) requesting tires. Sgt. Roberson eventually told me to stop asking and go to the sheriff because these people don't do their jobs. As I was going to see the Sheriff, Capt. Bullock asked what's wrong? (After I walked in his office for the third time) and where is your car? He saw the car and went to Lt. Shearin and I got some tires same day despite both of them knowing I needed tires prior to. The metal wires were showing on rear tires.

Last July 2017, Deputy Warren Durham (S-95) heard a bullet ricochet off of his vehicle on Breckenridge Street, near the jail and feared for his life. That was the same night that former Deputy Erik Sheftal (S-29) held a suspect at gun point in the city limits of Henderson by the library. Deputy Durham had previously asked Lt. Shearin for a vest to no avail.

In January 2018, Deputy Al-Wadeif (S-28) was responding to calls without a vest with Lt. Campbell and I questioned him being on the streets without a vest. Lt. Campbell called Lt. Shearin and he came to the sheriff's office and issued him a vest (speedily despite my situation).

It should be noted, Lt. Shearin is a Caucasian male and the parties listed above are minorities. This is a civil rights issues. Also, Lt. Shearin was directed by the High Sheriff to issue me equipment i.e. in September 2018 twice to no avail

While I serve at the pleasure of, I contend these issue do not fit the criteria as they would reasonably violate county and or departmental policy, federal civil rights laws, NC Public Policy Doctrine, NC Tort Law, etc. Also, taking adverse action against someone after reporting the aforementioned is reprisal and or retaliation. How can one write up, suspend and dock pay of the black man but the same alleged offenses are being committed by white deputies? How can one

write up, suspend and dock pay of subordinate but allow other supervisory or managerial deputies to get away with it? How can the subordinate deputy be suspend for insubordination & the chief deputy, captain & lieutenant are not held to the same standard for being insubordinate? DND/44

*****SOMETHING IS WRONG WITH THIS PICTURE & NEEDS CORRECTING*****

It is to my recommendation that Chief Bullock be issued a corrective action and suspended for 10 days without pay in reference to insubordination by not returning me to Sgt. Roberson's shift and not obtaining statements for the allegations made by Lt. Campbell.

It is to my recommendation that Capt. Watkins receive a lesser sanction as the chief deputy had the overall responsibility as the manager with rank/seniority to ensure my transfer back to Sgt. Roberson's shift and that they met with me about the allegations by Lt. Campbell.

It is to my recommendation that Lt. Shearin be issued corrective action and suspended for 10 days without pay and demoted in reference to failing the issue the protective and necessary law enforcement equipment after being directed to do so by the Sheriff several times.

It is to my recommendation that Lt. Campbell be issued corrective action, suspended for 10 days without pay & demoted for his official misconduct & verbal/written deception pertinent to the write up.

I understand it will be difficult in disciplining members of your command staff but as you said in times past, we have to be fair.

There were no legitimate non-discriminatory reasons to issue corrective action and authorize adverse action. There are no bona-fide reasons and or business necessity for the abovementioned. Even if responsibility laid with me, then the mixed motive legal theory would apply.

I look forward in hearing from you and resolving this issue.

Sincerely,

Justin White, M.S., B.S.
JW *JW* 4-22-2018

Cc: File
Argretta Johen, HR Director
Peter White, High Sheriff
Justin White, Deputy Sheriff

30 Channel 1 m... 6/22/2018

State of North Carolina
County of Vance

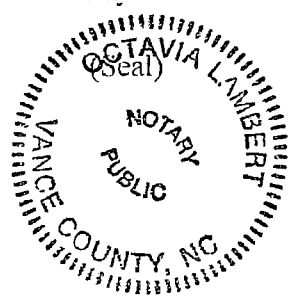
On this, the 22nd day of June, 2018, before me a notary public, the undersigned party, personally appeared [Signature], known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.

[Signature]
Notary Name

My commission expires: July 2, 2020

[Signature]
Notary Signature



June 15th, 2018**Transmitted via Hand Delivery**

Sheriff Peter White
Vance County Sheriff's Office
156 Church Street, Suite 004
Henderson, NC 27536
Pwhite@vancecounty.org

Personnel Sensitive, Confidential & Sworn File**Re: Employee Performance Appraisal Rebuttal**

Dear Sheriff

I, Justin J. White, deputy sheriff, hereby file rebuttal in reference to the aforementioned done by Sergeant Myron D. Alexander (S-12), Patrol Supervisor. Same was done on June 1st, 2018, 4 months approximately after I was transferred from his shift. I was notified of this document on June 8th, 2018, at 6 p.m. by Sgt. Chris M. Welborn (S-13), Patrol Supervisor & presented with same to sign in which I noted being in strong disagreement with. I shared my dissent with Sgt. Welborn, in which Sgt. Bobby Martin (S-11) was present & I was told to appeal it. Attached is a copy of my performance appraisal.

✗ Sgt. Welborn advised me, JJ (me) you are a good employee, you work & you got some know how. Sgt. Welborn stated, this report is biased because Myron have personal issues with you. He advised me, you are a team player & professional with the citizens & us but I do get a little carried away from time to time but not too much. Sgt. Welborn claimed, JJ we all get a little carried away from time to time, it's going to happen. Sgt. Welborn stated, you are not insubordinate, you follow orders & do your job. Sgt. Welborn stated, go to the sheriff & talk to him.

✗ Sgt. Bobby Martin advised me to file a rebuttal with the High Sheriff so it can be reviewed & removed from my file & if it was not overturned then for the rebuttal to be attached to the performance evaluation. Also, Sgt. Martin advised me that he had the same situation happen with a supervisor in investigations. Sgt. Martin claimed to have prepared a rebuttal & presented same to you & asked to be transferred since he could not satisfy his supervisor. Sgt. Martin won his case.

✗ First & foremost, I am a stern & firm individual. I am shocked that Sgt. Alexander portrayed me negatively especially when he claimed that he did not have a problem with my job performance and or personal conduct in early January 2018 during a meeting with management, supervision & subordinates. Also, I have not been written up several times for my attitude & work ethics, nor have I been very insubordinate towards supervisors. Based on those deceptive & frivolous allegations, I request to view & copy my complete personnel file. It should be noted, I asked to see the file that Chief Bullock had when I was suspended in February 2018, in which I was denied & told, you have everything you need.

How can Sgt. Alexander adjudicate my performance or personal conduct when he does not show up to work on time & has been a no call no show on calls for service on various occasions with staff that have requested back up? He is the king of absenteeism & tardiness. In fact, he is the reason why a memo was issued 6-7 months ago for patrol to report to clock on at 5:30 and report to work at 5:45 & he does not adhere to same. Plenty of times, my supervisor & I waited for him to come to work & he would show up at 7 a.m. but his staff was on time. It is substantially rare for him to clock on on-time.

X For example, Sgt. Alexander failed to report to work on time for 1 ½ hrs approximately, leaving me to answer calls in county alone & without back up, he gave Deputy I. Greene (trainee at-the-time) & Deputy T. Terry permission to come in late by using comp time. A burglary call (10-62 in progress) was assigned to me which was later downgraded to a prowler (10-76). Both calls for service were/are priority. The caller stated someone was trying to break into her residence & hung up. Then, she called back saying someone was trying to come through her window & that she heard them outside. I determined it was not a burglary or prowler but the wind causing the metal antenna & electric wires on her trailer to mimic same. In fact, day shift who was already off provided back up without my request since I was by myself. Sgt. Alexander was not appropriately disciplined for lying to Lt. Campbell (insubordination) claiming he was at work, when he was not, neglecting duty and failing to report as scheduled.

Deputy Branch (S-34) went to the sheriff's office on his day off a few months ago & met with Chief Bullock & Captain Watkins in reference to complaining on Sgt. Alexander pertinent to him not answering calls, not backing up deputies & not being accessible. As a matter of fact, Deputy Branch reported to management, supervision & co-workers that Sgt. Alexander was clearing calls after riding past the house & not stopping. Deputy Branch requested to be transferred to another shift & management told him to tough it out until the guys were out of training in May.

Deputy Poole (S-40) complained on Sgt. Alexander & wanted to be moved. In fact, on a call in January 2018, in which we had a burglary in progress call during the winter storm & Sgt. Alexander & Deputy Greene (S-41) were closer. Deputy Poole & I were near U.S. 1 S by the Franklin & Vance county line & we got there first & handled same despite them being on Warrenton road near U.S. 1. That incident triggered Deputy Poole's 10 day suspension, however, no one got on Myron for threatening Deputy Poole on the radio, you want to put your life on it in reference to who was closer to Regina Lane. Also, Sgt. Alexander, told Deputy Poole on the phone, I don't have to answer call because I am the supervisor.

Deputy Burns had problems with Sgt. Alexander not working & was constantly complaining on him to the Chief Bullock & Capt. Watkins. Also, former Deputy Lauren Matthews had a host of problems with Sgt. Alexander & was complaining.

According to supervision, every person that goes to his shift, either gets transferred or quits.

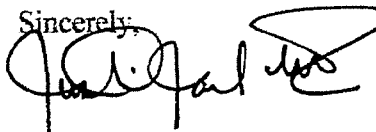
150 Chappel Lane • Kittrell, NC 27544 • (919) 961-3448 •

As a matter of recent fact, Deputy Al-Wadeii (S-28) worked Sgt. Alexander's shift f & was complaining to supervision on the other shift that he called for backup on Vicksboro Road & no one came but Deputy Edwards (S-24), who was the Northside car. Deputy Edwards stated he diverted from a call (pending) because Deputy Al-Wadeii called for help. Deputy Al-Wadeii claimed that Sgt. Alexander & Deputy Greene are always together.

As you can see, Sgt. Alexander has a history of unacceptable personal conduct and or grossly inefficient job performance. These matters needed attention. It is to my recommendation that Sgt. Alexander be suspended for 15 days without pay & demoted.

I look forward in hearing from you & resolving this matter internally.

Sincerely,

 6-20-18

Justin J. White, M.S., B.S.

Enclosures: (1)
Performance Appraisal

Cc: File

Argretta Johen, HR Director
Peter White, High Sheriff
Justin White, Deputy Sheriff
Chris Welborn, Sergeant
Bobby Martin, Sergeant

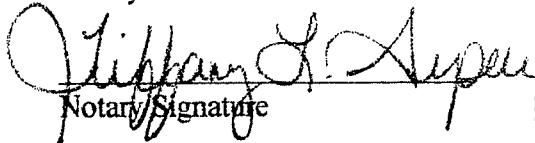
State of North Carolina
County of Vance

On this, the 20 day of June, 2018, before me a notary public, the undersigned party, personally appeared Justin J. White known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto for the above-mentioned hereby set my hand and official seal.

Tiffany L. Ayscue
Notary Name

My commission expires: July 31, 2019


Notary Signature